

EXHIBIT 1

Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No.

IN RE: SOCIAL MEDIA ADOLESCENT 4:22-MD-03047-YGR
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

This Document Relates To:

Tucson Unified School District
v. Meta Platforms Inc., et a
Case No. 4:24-cv-1382

VIDEOTAPED 30(b)(6) DEPOSITION OF
TUCSON UNIFIED SCHOOL DISTRICT
BY AND THROUGH
JULIE A. SHIVANONDA

Held At: JW Marriott Tucson
Starr Pass Resort & Spa
3800 W. Starr Pass Blvd
Tucson, Arizona

April 8th, 2025
2:02 p.m.

Reported By:

MAUREEN O. POLLARD, CA CSR #14449, RDR

<p style="text-align: right;">Page 2</p> <p>1 2 3 Videotaped 30(b)(6) Deposition of 4 Tucson Unified School District, by and through 5 JULIE A. SHIVANONDA, held at JW Marriott Tucson 6 Starr Pass Resort & Spa, 3800 W. Starr Pass 7 Blvd., Tucson, Arizona, commencing at 2:02 p.m., 8 on the 8th of April, 2025, before Maureen 9 O'Connor Pollard, Registered Diplomat Reporter, 10 Realtime Systems Administrator, California CSR 11 #14449. 12 13 14 $\ddot{t}_c \frac{1}{2} \ddot{t}_c \frac{1}{2} \ddot{t}_c \frac{1}{2}$ 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 APPEARANCES (Continued): 2 3 ON BEHALF OF SNAP, INC.: 4 MUNGER, TOLLES & OLSON 5 350 South Grand Avenue, 50th Floor 6 Los Angeles, California 90071-3426 7 213-683-9516 8 BY: VICTORIA A. DEGTYAREVA, ESQ. 9 victoria.degtiareva@mto.com 10 BY: ROWLEY RICE, ESQ. 11 rowley.rice@mto.com 12 BY: JULIA KONSTANTINOVSKY, ESQ. (Zoom) 13 julia.konstantinovsky@mto.com 14 BY: MOHAMED SAID, ESQ. (Zoom) 15 mohamed.said@mto.com 16 and 17 MUNGER, TOLLES & OLSON 18 601 Massachusetts Avenue NW 19 Suite 500E 20 Washington, DC 20001 21 202-220-1126 22 BY: STEPHANY REAVES, ESQ. 23 stephany.reaves@mto.com 24 25 Also Present: Videographer and Trial Tech: Dan Lawlor</p>
<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES: 2 3 ON BEHALF OF THE PLAINTIFFS: 4 WAGSTAFF & CARTMELL 5 4740 Grand Avenue, Suite 300 6 Kansas City, Missouri 64112 7 816-701-1145 8 BY: MICHAEL P. CUTLER, ESQ. 9 mcutler@wcllp.com 10 11 ON BEHALF OF META PLATFORMS, INC. f/k/a 12 FACEBOOK, INC.; FACEBOOK HOLDINGS, LLC; 13 INSTAGRAM, LLC; FACEBOOK PAYMENTS, INC.; 14 FACEBOOK OPERATIONS, LLC; FACEBOOK TECHNOLOGIES, 15 LLC; SICULUS, INC.; and MARK ELLIOT ZUCKERBERG: 16 SHOOK, HARDY & BACON LLP 17 2555 Grand Boulevard 18 Kansas City, Missouri 64108 19 816-474-6550 20 BY: DANA STRUEBY, ESQ. 21 dstrueby@shb.com 22 BY: COURTNEY C. BURRESS, ESQ. (Zoom) 23 cburress@shb.com 24 25 ON BEHALF OF ALPHABET INC., GOOGLE LLC, and YOUTUBE, LLC: WILLIAMS & CONNOLLY LLP 630 Maine Avenue, S.W. Washington, DC 20024 202-434-5380 BY: ARMANI MADISON, ESQ. (Zoom) amadison@wc.com</p>	<p style="text-align: right;">Page 5</p> <p>1 INDEX 2 EXAMINATION PAGE 3 JULIE A. SHIVANONDA 4 BY MS. DEGTYAREVA 10 5 6 7 E X H I B I T S 8 NO. DESCRIPTION PAGE 9 Tucson-30(b)(6)- Defendants' Amended Shivanonda-1 Supplemental Notice 10 of Oral and Videotaped 30(b)(6) 11 Deposition of Plaintiff Tucson 12 Unified School District..... 12 13 Tucson-30(b)(6)- Minutes for Regular 14 Shivanonda-2 Board Meeting, Tuesday, September 15 12, 2023..... 38 16 Tucson-30(b)(6)- Tucson Unified School Shivanonda-3 District's Second 17 Supplemental Initial Disclosure Statement 18 Pursuant to Federal Rule of Civil 19 Procedure 20 26(A)(1)(A)(iii)..... 52 21 Tucson-30(b)(6)- Plaintiff's Amended 22 Shivanonda-4 Answers to Defendants' 23 Interrogatories to Tucson Unified School District (Set 3)..... 56 24 Tucson-30(b)(6)- Plaintiff Fact Sheet Shivanonda-5 - School Districts (Supplemental)..... 114 25</p>

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<p style="text-align: right;">Page 10</p> <p>1 EXAMINATION</p> <p>2 BY MS. DEGTYAREVA:</p> <p>3 Q. Good afternoon, Ms. Shivanonda.</p> <p>4 Can you please state your name for</p> <p>5 the record?</p> <p>6 A. Julie Ann Shivanonda.</p> <p>7 Q. And do you live here in Tucson?</p> <p>8 A. I do.</p> <p>9 Q. Do you understand that you're under</p> <p>10 oath today?</p> <p>11 A. I do.</p> <p>12 Q. Is there any reason that you can't</p> <p>13 give truthful and accurate testimony today?</p> <p>14 A. No.</p> <p>15 Q. And are you currently employed by</p> <p>16 Tucson Unified School District?</p> <p>17 A. Yes.</p> <p>18 Q. How long have you been employed by</p> <p>19 the school district?</p> <p>20 A. I began in 2012, and then I left the</p> <p>21 district from 2020 until September of 2021 and</p> <p>22 returned in September 2021. So that's about</p> <p>23 total 13 years.</p> <p>24 Q. What is your current job position?</p> <p>25 A. Director of social emotional</p>	<p style="text-align: right;">Page 12</p> <p>1 defendants' platforms, and do you understand</p> <p>2 that when I say "defendants' platforms" I'm</p> <p>3 referring to Facebook, Instagram, TikTok,</p> <p>4 Snapchat, and YouTube?</p> <p>5 A. Yes.</p> <p>6 Q. Now, do you understand that TUSD has</p> <p>7 designated you today to testify about a number</p> <p>8 of different topics?</p> <p>9 A. Yes.</p> <p>10 MS. DEGTYAREVA: Let's mark as</p> <p>11 Exhibit 1 tab 2.</p> <p>12 (Tucson-30(b)(6)-Shivanonda-1 was</p> <p>13 marked for identification.)</p> <p>14 MR. CUTLER: I've got mine from this</p> <p>15 morning. Is it the same one?</p> <p>16 MS. DEGTYAREVA: It should be, yeah.</p> <p>17 We're going to restart at 1, but it should</p> <p>18 be the same.</p> <p>19 MR. CUTLER: I don't need another</p> <p>20 copy. Thank you.</p> <p>21 BY MS. DEGTYAREVA:</p> <p>22 Q. Ms. Shivanonda, can you please turn</p> <p>23 to page 7 of this exhibit? And do you see on</p> <p>24 page 7 under Roman Numeral II it says Deposition</p> <p>25 Topics?</p>
<p style="text-align: right;">Page 11</p> <p>1 learning and school counseling.</p> <p>2 Q. And what are your responsibilities</p> <p>3 in that role?</p> <p>4 A. So I oversee the department, which</p> <p>5 includes our school counselors. I oversee two</p> <p>6 school counseling coordinators, a coordinator of</p> <p>7 social emotional learning, a program manager of</p> <p>8 substance abuse prevention, a program</p> <p>9 coordinator of substance abuse prevention, and</p> <p>10 five community health workers.</p> <p>11 And so our job is tasked with</p> <p>12 supporting the social emotional well-being needs</p> <p>13 of our students and our communities within the</p> <p>14 Tucson Unified School District.</p> <p>15 Q. And do you understand that you're</p> <p>16 testifying today as a corporate representative</p> <p>17 of the Tucson Unified School District?</p> <p>18 A. I do.</p> <p>19 Q. So throughout my questions today I'm</p> <p>20 going to at points say "TUSD" or "the district,"</p> <p>21 and do you understand that when I say those</p> <p>22 things I'm referring to Tucson Unified School</p> <p>23 District?</p> <p>24 A. Correct.</p> <p>25 Q. I'm also going to talk about</p>	<p style="text-align: right;">Page 13</p> <p>1 A. Yes.</p> <p>2 Q. I just want to go through these so</p> <p>3 that you can confirm which topics you're</p> <p>4 prepared to testify about as TUSD's</p> <p>5 representative.</p> <p>6 Looking at the first title there,</p> <p>7 Use and Impact, Topics 1 through 7, which goes</p> <p>8 on to pages 8 and 9. Are you prepared to</p> <p>9 testify about Topics 1 through 7?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And then under Awareness,</p> <p>12 Prevention, and Response, it has Topics 8</p> <p>13 through 23 on pages 9, 10 and 11. Are you</p> <p>14 prepared to testify about Topics 8 through 23?</p> <p>15 A. Yes.</p> <p>16 Q. We're going to skip the next one and</p> <p>17 go to page 13, Student Mental Health and Related</p> <p>18 Services, and under that, Topics 32 through 48</p> <p>19 which ends on page 16. Are you prepared to</p> <p>20 testify about Topics 32 through 48?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. The next one on page 16 is</p> <p>23 Discipline and School Safety, Topics 49 and --</p> <p>24 sorry, 49 through 55, ending on page 17. Are</p> <p>25 you prepared to testify about Topics 49</p>

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<p style="text-align: right;">Page 14</p> <p>1 through 55?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Then under School District</p> <p>4 Performance and Operations, which begins on</p> <p>5 page 17, are you prepared to testify about</p> <p>6 Topics 56 through 59? So not Topic 60 in that</p> <p>7 section.</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Going on to page 18 where it</p> <p>10 says Relief, are you prepared to testify to</p> <p>11 Topics 61, 62, and 63?</p> <p>12 A. Yes.</p> <p>13 Q. And then, finally, under Other</p> <p>14 District-Specific Topics, are you prepared to</p> <p>15 testify to Topics 64 and then 66 through 69?</p> <p>16 A. It was my understanding that 66</p> <p>17 would have been a previous defendant.</p> <p>18 Q. Excuse me. I think I misspoke. 64</p> <p>19 through 67 through 69.</p> <p>20 A. So 64, 65, 67, 68, and 69?</p> <p>21 MR. CUTLER: 64, 67, 68, 69, I think</p> <p>22 is what she said.</p> <p>23 THE WITNESS: Yes.</p> <p>24 BY MS. DEGTYAREVA:</p> <p>25 Q. Okay. 64, 67, 68, and 69, are you</p>	<p style="text-align: right;">Page 16</p> <p>1 A. So I met with a handful of our</p> <p>2 school district counselors, the department --</p> <p>3 the director of school safety, director of</p> <p>4 student relations, director of instructional</p> <p>5 technology, director of human resources,</p> <p>6 assistant superintendent of curriculum and</p> <p>7 instruction, counseling coordinator for middle</p> <p>8 school and high school. And I believe that</p> <p>9 covers it.</p> <p>10 Q. Okay. I want to walk through a</p> <p>11 couple of those.</p> <p>12 You said you met with a handful of</p> <p>13 school district counselors. Do you remember how</p> <p>14 many?</p> <p>15 A. Roughly ten.</p> <p>16 Q. And were those counselors from --</p> <p>17 were they assigned to a specific school?</p> <p>18 A. Yes. So each of our schools, they</p> <p>19 do have either one or multiple school</p> <p>20 counselors, and so the call was put out to any</p> <p>21 school counselors who were interested in</p> <p>22 discussing with me. So there was about ten</p> <p>23 school counselors ranging from elementary,</p> <p>24 middle, and high school who were involved.</p> <p>25 Q. Of those approximately ten</p>
<p style="text-align: right;">Page 15</p> <p>1 prepared to testify about those topics?</p> <p>2 A. Yes, correct. I apologize.</p> <p>3 Q. Thank you.</p> <p>4 And do you understand that your</p> <p>5 testimony today is the testimony of Tucson</p> <p>6 Unified School District?</p> <p>7 A. Yes.</p> <p>8 Q. So because you are testifying on</p> <p>9 behalf of the school district, I sometimes might</p> <p>10 say "you" in my questions, and when I say that</p> <p>11 I'm referring to Tucson Unified School District.</p> <p>12 Do you understand that?</p> <p>13 A. I do.</p> <p>14 Q. What did you do to prepare to</p> <p>15 testify for all of the topics that you've been</p> <p>16 designated on?</p> <p>17 A. So I met with our legal counsel,</p> <p>18 outside legal counsel as well as internal legal</p> <p>19 counsel. I reviewed some of the documents</p> <p>20 within this case that were shared with me from</p> <p>21 legal counsel. And then I met with other</p> <p>22 district-level stakeholders that might have more</p> <p>23 explicit information in preparation.</p> <p>24 Q. So apart from legal counsel, which</p> <p>25 other people did you meet with?</p>	<p style="text-align: right;">Page 17</p> <p>1 counselors, do you remember how many were</p> <p>2 assigned to middle schools versus high schools</p> <p>3 versus elementary schools?</p> <p>4 A. From my recollection, I don't</p> <p>5 remember exactly, there was at least two that</p> <p>6 were representing middle school, and then</p> <p>7 probably five or six were at the elementary</p> <p>8 school level, and the rest were at the high</p> <p>9 school level.</p> <p>10 Q. So you said -- so if there's about</p> <p>11 two at middle school, five or six at elementary,</p> <p>12 does that mean two or three were high school?</p> <p>13 Does that sound about right?</p> <p>14 A. Yes.</p> <p>15 Q. Do you remember -- do the</p> <p>16 counselors -- are they assigned to any</p> <p>17 particular type of topic area or subject area,</p> <p>18 or do all counselors just provide general</p> <p>19 counseling services?</p> <p>20 A. So in TUSD we following the ASCA</p> <p>21 model, the American School Counselor Association</p> <p>22 model, and so all of our school counselors are</p> <p>23 tasked with meeting the requirements of the ASCA</p> <p>24 model. So they do focus on academic support and</p> <p>25 readiness, social emotional support and</p>

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<p style="text-align: right;">Page 18</p> <p>1 readiness, as well as college and career 2 readiness. 3 Q. So none of the counselors you talked 4 to would have been specialized in any particular 5 subject area? 6 A. Correct. 7 Q. And I think you mentioned the 8 director of school safety, is that right? 9 A. Yes. 10 Q. Who is that? 11 A. Mr. Joe Hallums. 12 Q. And the director of student 13 relations, right? 14 A. Yes. Anna Warmbrand. 15 Q. And then the director of 16 instructional technology, who is that? 17 A. Tracey Rowley. 18 Q. Okay. The director of human 19 resources, who is that? 20 A. Jon Fernandez. 21 Q. Okay. And then the assistant 22 superintendent of curriculum and instruction, 23 who is that? 24 A. Dr. Flori Huitt. 25 Q. And then counseling coordinator for</p>	<p style="text-align: right;">Page 20</p> <p>1 Well, I guess if you know you can 2 answer that question. Go ahead. 3 THE WITNESS: So Dr. Hoover is an 4 expert in social emotional learning, 5 mental health, and she is from -- I don't 6 remember what college she's from, but she 7 was retained as an expert in the case, is 8 my understanding. 9 BY MS. DEGTAREVA: 10 Q. So what was the purpose of your 11 meeting with Dr. Hoover? 12 MR. CUTLER: I'm going to object to 13 that to the extent it calls for privileged 14 communications. 15 BY MS. DEGTAREVA: 16 Q. So, Ms. Shivanonda, unless your 17 counsel instructs -- 18 MR. CUTLER: Yeah, I'll instruct you 19 not to answer the question. 20 BY MS. DEGTAREVA: 21 Q. In terms of preparing for this -- to 22 testify about the topics that you were 23 designated for in this deposition, what did you 24 discuss with Dr. Hoover? 25 MR. CUTLER: Again I'm going to</p>
<p style="text-align: right;">Page 19</p> <p>1 middle school and high school, who is that? 2 A. Rebecca Carrier. 3 Q. And for all of those positions, are 4 all of those positions sort of there's just one 5 person in each position, or are they kind of 6 like the counselors where there other people in 7 those positions that you didn't talk to? 8 A. No, they are those of those 9 positions, correct. 10 Q. Okay. So apart from those people we 11 just talked about, anybody else other than 12 counsel that you spoke to to prepare for the 13 deposition? 14 A. I don't know if that was part of 15 preparation, but we did meet with an expert, 16 Dr. Hoover. 17 Q. What's his first name? 18 MR. CUTLER: You can answer. 19 THE WITNESS: I don't remember her 20 first name. 21 BY MS. DEGTAREVA: 22 Q. Her first name. 23 And what type of expert is 24 Dr. Hoover? 25 MR. CUTLER: I'm going to object.</p>	<p style="text-align: right;">Page 21</p> <p>1 object that it's not part of deposition 2 preparation. 3 And I'll instruct you not to answer. 4 BY MS. DEGTAREVA: 5 Q. So just to be clear, did you meet 6 with Dr. Hoover to prepare for the deposition? 7 MR. CUTLER: I think she answered 8 that. 9 Go ahead. 10 THE WITNESS: No. In terms of these 11 topics, in preparation was meeting with 12 stakeholders within the district. As part 13 of the larger context there was a meeting 14 that happened with Dr. Hoover. 15 MR. CUTLER: Which is separate from 16 this deposition, so I think the questions 17 are about the deposition preparation. 18 BY MS. DEGTAREVA: 19 Q. Got it. 20 So in terms of preparation for the 21 topics that you were designated on for this 22 deposition, apart from the people we talked 23 about, and your counsel, anybody else that you 24 met with to prepare? 25 A. No.</p>

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<p style="text-align: right;">Page 22</p> <p>1 Q. I think you said that you also 2 reviewed some documents. What documents did you 3 review? 4 A. I reviewed this document to be in 5 preparation of the topics, as well as Plaintiff 6 Fact Sheet, as well as interrogatory documents. 7 Q. Did you review any internal TUSD 8 documents or documents from TUSD databases, 9 e-mail, anything that wasn't prepared for 10 purposes of the litigation specifically? 11 MR. CUTLER: Anything not prepared 12 specifically for the litigation. 13 THE WITNESS: I don't believe it was 14 not prepared for the litigation, no. This 15 was in preparation for the litigation. 16 BY MS. DEGTAREVA: 17 Q. I'm sorry, maybe that was a poorly 18 worded question. 19 But apart from rog responses, the 20 PFS, and then the deposition notice, any other 21 documents you reviewed? 22 A. Yes. Internal documents. 23 Q. What internal documents did you 24 review? 25 A. Documents around practices in the</p>	<p style="text-align: right;">Page 24</p> <p>1 within their work. 2 Q. Okay. Does that cover it? Anything 3 else you reviewed, any other documents? 4 A. That's -- yeah, that's basically it. 5 Q. I'm going to ask you a couple more 6 questions about the documents, but you mentioned 7 there was one other person you spoke with that 8 you hadn't mentioned before. Who was that? 9 A. Yes. Michael Blunt, he is a 10 coordinator of our multi-tiered system of 11 support process in the district. 12 Q. Got it. 13 Okay. So regarding the documents, 14 for the public documents I think you mentioned 15 board meeting minutes, is that right? 16 A. Yes. 17 Q. Do you remember which meeting 18 minutes you reviewed? 19 A. I do not. I did an overall kind of 20 general search for -- some of the questions 21 referred to any discussion topics around social 22 media, so a general search of potential 23 discussions around social media, as well as 24 governing board policy. 25 Q. And when you say you did the search,</p>
<p style="text-align: right;">Page 23</p> <p>1 school district, reviewing public documents, so 2 public information around -- there were some 3 questions around the district academic 4 performance and attendance data which is part of 5 internal documents, which is also publicly 6 populated; review of public documents of 7 governing board meetings; review of discipline 8 and school safety data which are part of 9 internal, which I believe were provided as part 10 of the deposition prep; internal created 11 documents for -- based on -- oh, there was one 12 other person that I forgot that I talked to. Is 13 that okay? 14 Q. Sure. Well, how about you finish 15 your answer about documents and then we'll go 16 back to that one other person. 17 A. So if I've spoken to anyone, it was 18 a review of particular data that would be able 19 to answer some of these questions. 20 And so there was some data collected 21 from our student information systems around 22 discipline data, around other documentation 23 around like our multi-tiered system of support 24 data, data that our counselors collect in terms 25 of as they monitor and adjust their practices</p>	<p style="text-align: right;">Page 25</p> <p>1 do you mean just within the board documents, or 2 you did some kind of broader search across 3 multiple databases? 4 A. Just within the governing board 5 document system. 6 Q. Do you remember what types of terms 7 you used? 8 MR. CUTLER: I'm going to object to 9 the extent that this was all done kind of 10 at the direction and/or with counsel. 11 If there are facts you learned or, I 12 guess, just the fact of having done it, 13 that's fine, but, you know, processes, 14 strategies, stuff like that are going to 15 be protected. 16 MS. DEGTAREVA: Are you instructing 17 her not to answer that question? 18 MR. CUTLER: Can you repeat the 19 question? 20 MS. DEGTAREVA: I think I asked if 21 she used any particular search terms on 22 those documents to identify the ones that 23 she reviewed. 24 MR. CUTLER: Yeah, I'll instruct her 25 not to answer.</p>

7 (Pages 22 - 25)

<p style="text-align: right;">Page 26</p> <p>1 MS. DEGTYAREVA: Okay.</p> <p>2 BY MS. DEGTYAREVA:</p> <p>3 Q. So for public documents, apart from</p> <p>4 these governing board meetings, any other public</p> <p>5 documents you reviewed?</p> <p>6 A. TUSD governing board policy</p> <p>7 documents as well as academic performance data.</p> <p>8 Q. Okay. And the academic performance</p> <p>9 data, what types of documents is that in?</p> <p>10 A. School letter grades.</p> <p>11 Q. Are those public documents?</p> <p>12 A. Those are public documents, yeah,</p> <p>13 the school report cards essentially through the</p> <p>14 Arizona State Department of Education.</p> <p>15 Q. Got it.</p> <p>16 Okay. You also mentioned discipline</p> <p>17 and school safety data. What does that refer</p> <p>18 to?</p> <p>19 A. So that would be data that is</p> <p>20 elicited from our student information system.</p> <p>21 So as we -- as the district reports</p> <p>22 student-level discipline, it gets reported into</p> <p>23 the Synergy, Student Information System, and so</p> <p>24 through my discussions with the director of</p> <p>25 student relations we reviewed specific</p>	<p style="text-align: right;">Page 28</p> <p>1 others about details underlying those numbers?</p> <p>2 A. Correct.</p> <p>3 Q. And who did you have those</p> <p>4 conversations with?</p> <p>5 A. Anna Warmbrand from student</p> <p>6 relations, and Joe Hallums from school safety.</p> <p>7 Q. Okay. You talked about data</p> <p>8 collected "from our student information</p> <p>9 systems." What data is that? Is that the</p> <p>10 Synergy data, or is that something else?</p> <p>11 A. That's the Synergy data.</p> <p>12 Q. And then other documentation around</p> <p>13 the multi-tiered system of support data, what</p> <p>14 does that refer to?</p> <p>15 A. That is also housed in Synergy, our</p> <p>16 student information system. There is a section</p> <p>17 within Synergy called MTSS dashboard, and so</p> <p>18 looking at -- and that is our intervention</p> <p>19 dashboard, so looking at specific numbers of</p> <p>20 interventions based on certain categories to</p> <p>21 give a broader picture of being able to answer</p> <p>22 some of these topics.</p> <p>23 Q. So apart from the discipline data</p> <p>24 and then the MTSS data in Synergy, any other</p> <p>25 data in Synergy that you looked at?</p>
<p style="text-align: right;">Page 27</p> <p>1 student-level discipline data in preparation for</p> <p>2 being prepared for some of these topics.</p> <p>3 Q. This is all data in Synergy?</p> <p>4 A. Yes.</p> <p>5 Q. Did you review just sort of</p> <p>6 aggregate numbers, or did you look up specific</p> <p>7 individual reports in Synergy?</p> <p>8 A. Aggregate numbers.</p> <p>9 Q. And so did you look at any</p> <p>10 details -- beyond just how many numbers of each</p> <p>11 violation, did you look at any details about</p> <p>12 what those particular violations -- who they</p> <p>13 were against, when they happened, what they were</p> <p>14 about?</p> <p>15 A. Not in detail, no.</p> <p>16 Q. You say "not in detail." Can you</p> <p>17 explain what you mean by that?</p> <p>18 A. So through conversations as an</p> <p>19 overall analysis of the data, discussions around</p> <p>20 more specific information, but the actual</p> <p>21 reports that I looked at were just the aggregate</p> <p>22 numbers.</p> <p>23 Q. Got it.</p> <p>24 So you looked at the aggregate</p> <p>25 numbers, but then you had conversations with</p>	<p style="text-align: right;">Page 29</p> <p>1 A. Well, part of the data that was part</p> <p>2 of discipline data is also the data that</p> <p>3 connects to school safety, and how school safety</p> <p>4 may or may not have responded in relation to the</p> <p>5 discipline data.</p> <p>6 Q. Can you explain what the school</p> <p>7 safety data is?</p> <p>8 A. So if there are disciplinary</p> <p>9 instances that happen on a school campus that</p> <p>10 may warrant school safety response, that would</p> <p>11 be collected within the investigation in a</p> <p>12 disciplinary instance.</p> <p>13 So some of the questions asked about</p> <p>14 whether or not school safety was a component of</p> <p>15 -- in some of these topics, so looking at</p> <p>16 potential -- if the overall, kind of, numbers</p> <p>17 around how often school safety may or may not</p> <p>18 have responded to any disciplinary instances on</p> <p>19 school campuses.</p> <p>20 Q. And was that aggregate data, or was</p> <p>21 that specific data about specific incidents?</p> <p>22 A. Overall aggregate.</p> <p>23 Q. Got it.</p> <p>24 When you talk about data that</p> <p>25 counselors collect, data that counselors</p>

<p style="text-align: right;">Page 30</p> <p>1 collect, what type of data did you review that 2 counselors collect?</p> <p>3 A. So counselors, they collect data 4 around number of students who are either 5 referred to them for support of any kind or 6 whether or not students visit the counseling 7 office for any sort of report or needs.</p> <p>8 Also school counselors provide 9 interventions based on what I said the previous 10 data are on, MTSS, so they collect that data.</p> <p>11 Counselors also in the past have 12 done more needs assessment type data around 13 their schools to drive their operating, whether 14 they do specific groups on school campus, and 15 so, but that -- over time due to legislation 16 that has been hindered somewhat.</p> <p>17 So just overall data around the use 18 of time for counselors of how often they're 19 meeting with students, how often they are 20 providing classroom lessons, and then numbers of 21 students visiting the counseling office.</p> <p>22 Q. Is all of that data stored in a 23 database of some sort?</p> <p>24 A. It's internal. So our coordinators 25 of counseling, they collect that data. That's</p>	<p style="text-align: right;">Page 32</p> <p>1 meeting, if they provided intervention supports 2 based on an intervention plan.</p> <p>3 Q. And the data that the counselors 4 collect, would that also include data about 5 individual students they met with?</p> <p>6 A. They do. So we do have processes in 7 the district for majority of our support staff, 8 when they do meet with students for specifics, 9 and so all of that is housed in the Synergy 10 student information system.</p> <p>11 Q. And the data that you reviewed, did 12 that include data about individual students that 13 the counselors met with?</p> <p>14 A. No, it did not. I was looking at 15 aggregate data.</p> <p>16 Q. Okay. Any other categories of data 17 that we haven't -- we talked about the data in 18 Synergy, the public documents, the data that the 19 counselors collect.</p> <p>20 Any other categories of data or 21 documents you reviewed?</p> <p>22 A. No.</p> <p>23 Q. Did you bring any documents with you 24 today?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 31</p> <p>1 generally through things like Microsoft Forms 2 that are internal data.</p> <p>3 Q. Okay. So do individual counselors 4 fill out a form every time they meet with a 5 student, or how do they -- how frequently would 6 they fill out these forms?</p> <p>7 MR. CUTLER: Object to form.</p> <p>8 You can answer.</p> <p>9 THE WITNESS: Okay. It depends. So 10 counselors, they will -- their time of 11 use, depending upon the level, so our 12 coordinator that supports middle and high 13 school, they do time of use, and she asks 14 for them to submit that quarterly, whereas 15 in elementary and K-8, that coordinator, 16 she has -- she asks for that data on a 17 monthly basis.</p> <p>18 BY MS. DEGTYAREVA:</p> <p>19 Q. The time of use data, is that just 20 here's how many hours I worked in a day, or is 21 that split up in a different way?</p> <p>22 A. It is, again, based on, you know, 23 number of small groups or classroom lessons or 24 number of students that they interacted with in 25 their office, or if they participated in an MTSS</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. And as you were reviewing the 2 documents or talking to the people, apart from 3 counsel, did you make any notes?</p> <p>4 A. Not outside of being directed by 5 counsel.</p> <p>6 Q. And did you bring any notes with you 7 today?</p> <p>8 A. No, I did not.</p> <p>9 Q. Apart from what we've already talked 10 about, anything else you did to prepare for the 11 deposition today?</p> <p>12 A. No.</p> <p>13 Q. Are you familiar with the 14 allegations in the case?</p> <p>15 A. From what I -- from talking with 16 counsel and based on the documents that we've 17 already discussed that we've reviewed --</p> <p>18 MR. CUTLER: If your understanding 19 is from counsel, I would instruct you not 20 to answer. If you have a 21 self-understanding, then respond with 22 that.</p> <p>23 THE WITNESS: Okay. My general 24 understanding is from discussions with 25 counsel.</p>

<p style="text-align: right;">Page 34</p> <p>1 BY MS. DEGTYAREVA:</p> <p>2 Q. So at a high level, do you</p> <p>3 understand that TUSD has filed a lawsuit that</p> <p>4 alleges that it has been harmed by defendants'</p> <p>5 platforms?</p> <p>6 A. Yes.</p> <p>7 Q. So when did TUSD first begin to</p> <p>8 believe that defendants' platforms were causing</p> <p>9 harms in its schools?</p> <p>10 A. So, first, that's -- that's kind of</p> <p>11 a difficult question. I think explicitly, the</p> <p>12 explicit intention or kind of investigation</p> <p>13 whether or not to move forward with a lawsuit,</p> <p>14 it's my understanding that those discussions</p> <p>15 began in spring of 2023 with the governing</p> <p>16 board, along with Dr. Trujillo, our</p> <p>17 superintendent, and legal counsel, creating,</p> <p>18 drafting the resolution to move forward in</p> <p>19 September of 2024.</p> <p>20 Q. So before spring of 2023, did TUSD</p> <p>21 have an understanding that defendants' platforms</p> <p>22 were causing harms in the schools?</p> <p>23 A. It is my understanding that there</p> <p>24 was a level of understanding that there was a</p> <p>25 causal link between some of the harm that we</p>	<p style="text-align: right;">Page 36</p> <p>1 Also, since 2014 we have had several</p> <p>2 iterations of data platforms, and so in previous</p> <p>3 data platforms it looks a little bit different</p> <p>4 than what our data platforms look like now. So</p> <p>5 being able to determine exact data and</p> <p>6 information, I'm not aware that -- if I could</p> <p>7 speak directly to that from that time period</p> <p>8 just because of the changes in data collection.</p> <p>9 Q. What were the previous platforms</p> <p>10 that were used?</p> <p>11 A. Previously to Synergy the district</p> <p>12 had an in-house-developed platform called</p> <p>13 Mojave, and so it was a student information</p> <p>14 system platform. It was also where a lot of our</p> <p>15 support staff documented their time, documented</p> <p>16 disciplinary actions, or any supports that they</p> <p>17 may have provided to students and/or</p> <p>18 conversations with families.</p> <p>19 Q. So when did the district switch from</p> <p>20 Mojave to Synergy?</p> <p>21 A. If I remember correctly, I believe</p> <p>22 that was around either 2017 or 2018.</p> <p>23 Q. Was the data from Mojave transferred</p> <p>24 into Synergy?</p> <p>25 A. As much as it was able to. So I'm</p>
<p style="text-align: right;">Page 35</p> <p>1 were noticing and direct causal link, or</p> <p>2 perceived causal link, to defendants' platforms,</p> <p>3 yes.</p> <p>4 Q. When did TUSD first start to think</p> <p>5 that there was a causal link?</p> <p>6 A. So from my understanding and in my</p> <p>7 work, when we really started to see a direct</p> <p>8 response was probably right around the --</p> <p>9 anywhere from 2014 to 2016 when we started to</p> <p>10 see an increase of discipline data and social</p> <p>11 emotional needs in students based on the</p> <p>12 increase of use of cellphone and social media</p> <p>13 platforms within our schools.</p> <p>14 Q. You say an increase in discipline</p> <p>15 data and social emotional needs.</p> <p>16 During that time period, 2014-2016,</p> <p>17 are you aware of any data that showed those</p> <p>18 increases were connected to cellphones or social</p> <p>19 media?</p> <p>20 A. So there's definitely anecdotal</p> <p>21 data.</p> <p>22 And then in terms of the school</p> <p>23 district in collecting that data, it's</p> <p>24 difficult. Not all of that data is necessarily</p> <p>25 able to be collected explicitly.</p>	<p style="text-align: right;">Page 37</p> <p>1 not a technology expert, and so my understanding</p> <p>2 is somewhat limited on how that can transfer.</p> <p>3 So that may have been some archived data, and</p> <p>4 then some of the data that could have been</p> <p>5 transferred, I believe, was transferred into the</p> <p>6 Synergy platform.</p> <p>7 Q. Does the district still have any</p> <p>8 data that was not able to be transferred from</p> <p>9 Mojave into Synergy?</p> <p>10 A. I am not 100 percent aware. I do</p> <p>11 know that, I believe it was two years ago, the</p> <p>12 district was involved in a technology breach,</p> <p>13 and so I know because of that a lot of previous</p> <p>14 data may not have been recovered. I don't know</p> <p>15 from what departments, what data was able to be</p> <p>16 recovered and not prior to moving into more of a</p> <p>17 cloud-based system.</p> <p>18 Q. TUSD asked its board of directors to</p> <p>19 authorize bringing this lawsuit at a meeting on</p> <p>20 September 12, 2023, is that right?</p> <p>21 A. Can you repeat the question?</p> <p>22 Q. Sure.</p> <p>23 TUSD asked its board of directors to</p> <p>24 authorize bringing this lawsuit, right?</p> <p>25 A. From my understanding, it was a</p>

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<p style="text-align: right;">Page 38</p> <p>1 discussion with superintendent, legal counsel, 2 the governing board. A lot of that work also 3 may have happened in executive session, which is 4 not public knowledge. 5 MR. CUTLER: I think she's just 6 asking about the process generally to 7 start. 8 BY MS. DEGTAREVA: 9 Q. Ms. Shivanonda, you can answer the 10 question as you understand it. If you don't 11 understand a question, I would be happy to 12 rephrase it. 13 A. Okay. So from my understanding the 14 process began looking in at spring of 2023. 15 Q. And was there a governing board 16 meeting on September 12, 2023, when this issue 17 was discussed? 18 A. I don't remember all the dates of 19 meetings off the top of my head. 20 MS. DEGTAREVA: Can we mark as 21 Exhibit 2 tab 45? 22 (Tucson-30(b)(6)-Shivanonda-2 was 23 marked for identification.) 24 BY MS. DEGTAREVA: 25 Q. Ms. Shivanonda, do you recognize</p>	<p style="text-align: right;">Page 40</p> <p>1 But in terms of when we look at 2 overall discipline data, reports from discipline 3 data, there has been discussions around the use 4 of social media and the connection of social 5 media within our discipline and our discipline 6 policies, as well as a yearly review of our code 7 of conduct, and based on previous discussions, 8 based on previous discipline data, adjustment to 9 our code of conduct based on the need. 10 So over the past few years we've 11 made different iterations of the code of 12 conduct, including the most recent one where 13 there was also discussion of use of technology 14 and social media in our schools. 15 Q. And understanding that you don't 16 remember exact dates, do you remember 17 approximately when these discussions concerning 18 social media occurred? Like a year? A month? 19 A. I would say, from my understanding, 20 on a fairly regular basis, as we do discuss -- 21 or as the board has discussed, or questions or 22 concerns have come up with the board around 23 discipline data, around school safety data, on a 24 fairly regular basis there's a connection to 25 social media that is discussed at governing</p>
<p style="text-align: right;">Page 39</p> <p>1 this document? 2 A. So these -- this appears to be the 3 meeting minutes from the TUSD governing board 4 from September 12, 2023. 5 Q. And if you turn to page 7 of the 6 document, you'll see at the very bottom it says 7 "Action: 6.3 Resolution in Support of 8 Litigation Against Social Media Companies." 9 A. Okay. 10 Q. Do you see that? 11 A. I do. 12 Q. Okay. And then underneath that, 13 "Motion to approve the Tucson Unified School 14 District Resolution in Support of Litigation 15 Against Social Media Companies." 16 Do you see that? 17 A. I do. 18 Q. So before this meeting on 19 September 12, 2023, had the topic of social 20 media addiction ever come up in any TUSD 21 governing board meetings? 22 A. Throughout governing board meetings 23 there are numerous topics that are brought to 24 the table. I can't speak to specific dates. I 25 have not have those memorized.</p>	<p style="text-align: right;">Page 41</p> <p>1 board meetings. 2 Q. So when was the first time that 3 connection to social media was discussed at a 4 governing board meeting? 5 MR. CUTLER: Object to form. 6 THE WITNESS: I -- again, I have not 7 memorized the dates of all the governing 8 board meetings. There are at least two 9 meetings a month for as many years as the 10 governing board has been active, so I 11 cannot give you that date. 12 BY MS. DEGTAREVA: 13 Q. Do you remember the year that 14 discussions of social media first began in a 15 governing board meeting? 16 MR. CUTLER: Object to form. 17 THE WITNESS: Again, going back to 18 around 2015, 2016 when we started seeing a 19 larger increase in the connection of 20 discipline with social media, I imagine 21 that could have been, but I'm not 22 100 percent sure exactly when that began. 23 BY MS. DEGTAREVA: 24 Q. And would any discussions around 25 social media, if they happened at a board</p>

<p style="text-align: right;">Page 42</p> <p>1 meeting, would they be reflected in the board 2 meeting notes?</p> <p>3 MR. CUTLER: Object to form.</p> <p>4 THE WITNESS: It's my understanding, 5 yes, all governing -- our school governing 6 board follows open meeting laws, and so 7 all of our governing board meetings are 8 recorded. They are -- the meetings and 9 minutes are available online. So all 10 recordings of -- by video and meetings are 11 available online.</p> <p>12 BY MS. DEGTYAREVA:</p> <p>13 Q. Now, apart from -- or before this -- 14 approving this motion to support the litigation 15 against social media companies, were there any 16 resolutions passed by the board that related to 17 social media?</p> <p>18 A. I'm not sure about specific 19 resolutions, but again, back to our code of 20 conduct, a lot of discussion around social media 21 and the levels of code of conduct and discipline 22 has been a topic, and that code of conduct has 23 been reviewed every year. Created a new code of 24 conduct a couple of years ago. Previously it 25 was the guidelines for rights, responsibilities</p>	<p style="text-align: right;">Page 44</p> <p>1 trends, we update our code of conduct to 2 match based on the discipline that we have 3 seen year to year and over time. And so 4 the updates to the code of conduct always 5 match what we are seeing within our 6 schools.</p> <p>7 BY MS. DEGTYAREVA:</p> <p>8 Q. And so were there -- I guess going 9 back to my question.</p> <p>10 Was the code of conduct -- were any 11 of the changes that were made in the new code of 12 conduct, were any of those changes made as a 13 result of social media use?</p> <p>14 A. In part. So as we look at the code 15 of conduct, there is a specific section around 16 improper use of technology. And so that was 17 also -- the verbiage was discussed and updated 18 due to the increase of the use of social media 19 within schools, yes.</p> <p>20 Q. Apart from that section, was there 21 anything else in the code of conduct that was 22 changed because of social media?</p> <p>23 A. Again, looking back at our previous 24 data and discipline data and what's needed in 25 the schools, very cognizant of that, and then</p>
<p style="text-align: right;">Page 43</p> <p>1 of students, as well as board actions around the 2 use of social media and technology.</p> <p>3 Q. When was the code of conduct -- the 4 new code of conduct created?</p> <p>5 A. I don't remember the year. GSRR, I 6 think was through 2020. There was a previous 7 director. I want to say either 2020 or 2021.</p> <p>8 Q. Has the code of conduct been updated 9 since then?</p> <p>10 A. It has. It is updated yearly.</p> <p>11 Q. So is it your testimony that the new 12 code of conduct that was created in either 2020 13 or 2021, was that created because of social 14 media?</p> <p>15 MR. CUTLER: Object to form.</p> <p>16 THE WITNESS: The code of conduct, 17 the new -- it was just a new iteration of 18 our previous guides and responsibilities. 19 So we have always had expectations of our 20 students. And then that also connects 21 with the due process as we look at 22 disciplinary practices within the 23 district.</p> <p>24 And so as we continue to change with 25 the times, as we identify disciplinary</p>	<p style="text-align: right;">Page 45</p> <p>1 adjusting our code of conduct due to that.</p> <p>2 So through the analysis of the data, 3 looking at the code of conduct, improper use of 4 technology was one of them.</p> <p>5 We do also look at, you know, 6 substance abuse as well as aggression data, and 7 all of that, also, I believe that there was some 8 discussion around the use of social media in 9 excess for some of those, and so updated some of 10 the code of conduct language due to that.</p> <p>11 Q. Okay. You mentioned substance 12 abuse.</p> <p>13 What changes were made to the code 14 of conduct related to substance abuse that were 15 made because of social media?</p> <p>16 MR. CUTLER: Object to form.</p> <p>17 THE WITNESS: So in the district we 18 have been very responsive to looking at 19 the needs of the community, and then 20 monitoring the data around the use of 21 substance use in our schools and in our 22 community.</p> <p>23 We've also looked -- we've also 24 created different opportunities for 25 interventions and resources and supports.</p>

<p style="text-align: right;">Page 46</p> <p>1 And so we have in the past, as part 2 of our code of conduct, if students are 3 engaged with substances, then there was a 4 stipulation in the code of conduct where 5 students were able to engage in substance 6 abuse workshop courses to reduce part of 7 their discipline. 8 And then with our newer, updated 9 department for substance abuse that we are 10 working on this year, we are adjusting 11 that, and that is no longer part of the 12 code of conduct to where -- discipline. 13 One of the reasons for that was we 14 were noticing that students were not 15 necessarily engaging in those workshops 16 and continuing to use and abuse 17 substances. And so the adjustment of the 18 code of conduct was falling back more on 19 the progressive discipline and following 20 through with that discipline versus 21 lightening the discipline, so to speak. 22 BY MS. DEGTYAREVA: 23 Q. So, Ms. Shivanonda, which of these 24 changes were made as a result of social media? 25 A. In response to what we've been</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. When you talk about the discipline 2 data, are you referring to the Synergy data? 3 A. Yes. 4 Q. So in the Synergy data, where would 5 you look in the data to see if an incident was 6 related to social media? 7 A. So that can be somewhat tricky. So 8 as we -- the way that the district documents 9 data, there's only so much information that can 10 be housed within Synergy. And so we look at the 11 highest level of infraction, and then through 12 the investigative process are able to then 13 determine the trigger point, so to speak, of 14 that discipline. 15 So in a lot of our discipline 16 practices, we were -- or discipline data, we 17 might see a higher level of on the -- the code 18 of conduct. That will be as kind of the main 19 disposition. 20 And then in a lot of the notes that 21 administrators might be adding to that 22 discipline entry would be in the investigation 23 as they're talking to the student that was 24 involved and the other students, any other 25 witnesses. And so through those we are then</p>
<p style="text-align: right;">Page 47</p> <p>1 seeing in our schools. So, again, as we look at 2 discipline data, the through line through most 3 of our discipline, we are finding that there are 4 connections to social media. 5 So often we would find substance 6 abuse or substance use on our school campuses 7 and through investigative practices identify 8 that a number of those instances were involved 9 with substance -- were involved with social 10 media. Students were receiving substances, 11 buying and selling substances via social media 12 platforms and practices. And so that also 13 adjusted the -- with the improper use of 14 technology on our campus, and then looking at 15 any of the other disciplinary practices that may 16 occur of that. 17 So if a student was engaging on 18 social media or improper use of technology, and 19 then if there was an aggression component, then 20 we would look at the progressive discipline. 21 And so all of that is wrapped in and connected 22 to the ongoing data points and analysis of how 23 we look at our discipline data to then adjust 24 our code of conduct and our progressive 25 discipline practices.</p>	<p style="text-align: right;">Page 49</p> <p>1 able to identify the majority of our discipline 2 practices are somehow connected to the use of 3 social media. 4 But, again, in our discipline, that 5 top infraction is because of the way that the 6 code of conduct is written, and then how we then 7 assign consequences based on that, and so we may 8 or may not always see in all of the discipline 9 records. 10 However, anecdotally, as we talk 11 with administrators on a regular basis, school 12 counselors, our administrators do work with 13 their regional assistant superintendents, as 14 well as student relations, as they look at the 15 overarching code of conduct and the infractions 16 to determine what a disciplinary consequence may 17 be. And so through those conversations we can 18 see that that kind of through line is generally 19 connected with social media in some way. 20 Q. So those notes you mentioned, would 21 those be notes that are accessible in Synergy? 22 A. They could potentially. It also 23 depends on the way that investigations are -- 24 not all of the notes from an investigation might 25 always make it into Synergy, again, due to the</p>

<p style="text-align: right;">Page 50</p> <p>1 platform itself and how we are able to document.</p> <p>2 Q. Where else would information about</p> <p>3 an investigation be found?</p> <p>4 A. It might be in personal notes that</p> <p>5 administrators and other school staff, they take</p> <p>6 as part of the investigation process.</p> <p>7 Q. Are those notes collected anywhere?</p> <p>8 A. Generally, they -- it depends on the</p> <p>9 notes and the infraction. They may or may not,</p> <p>10 just because of FERPA violations that may or may</p> <p>11 not be housed within a student's cumulative file</p> <p>12 or not.</p> <p>13 Q. Are there any other places where</p> <p>14 notes from an investigation into discipline</p> <p>15 might be found?</p> <p>16 MR. CUTLER: Object to form.</p> <p>17 THE WITNESS: Outside of Synergy and</p> <p>18 if an administrator has their own notes, I</p> <p>19 don't believe so.</p> <p>20 BY MS. DEGTAREVA:</p> <p>21 Q. So if you wanted to find out if a</p> <p>22 particular incident related to social media, how</p> <p>23 would you go about doing that?</p> <p>24 A. Well, we would look at the overall</p> <p>25 discipline data within Synergy, and then have</p>	<p style="text-align: right;">Page 52</p> <p>1 that they're required to fill out that then gets</p> <p>2 turned into the student relations department.</p> <p>3 Q. And so every school has this type of</p> <p>4 meeting twice per month?</p> <p>5 A. That is the expectation, yes.</p> <p>6 Q. Is there some -- is there a</p> <p>7 centralized place where all of the meeting</p> <p>8 templates that are filled out, where those are</p> <p>9 stored?</p> <p>10 A. Yes. There's a SharePoint site that</p> <p>11 is facilitated by the student relations</p> <p>12 department.</p> <p>13 Q. Okay.</p> <p>14 MS. DEGTAREVA: Can we please -- I</p> <p>15 think we're on Exhibit 3. Can we mark</p> <p>16 tab 46 as Exhibit 3?</p> <p>17 (Tucson-30(b)(6)-Shivanonda-3</p> <p>18 Was marked for identification.)</p> <p>19 BY MS. DEGTAREVA:</p> <p>20 Q. Ms. Shivanonda, do you recognize</p> <p>21 this document?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. This is titled Tucson Unified</p> <p>24 School District's Second Supplemental Initial</p> <p>25 Disclosure Statement Pursuant to Federal Rule of</p>
<p style="text-align: right;">Page 51</p> <p>1 conversations with administrators.</p> <p>2 The other component of that, if we</p> <p>3 were to look into that data, all of our schools</p> <p>4 do follow a practice of looking at their</p> <p>5 school-level data.</p> <p>6 We have what's called behavior</p> <p>7 management team meetings that are required with</p> <p>8 every school twice per month where they look at</p> <p>9 their weekly and their monthly discipline data,</p> <p>10 and then they have conversations around the</p> <p>11 hotspots around the schools, are we seeing that</p> <p>12 we're seeing an increase of fights on the</p> <p>13 playground, are we seeing an increase of</p> <p>14 students eloping from classrooms, are we seeing</p> <p>15 evidence of reduced attendance.</p> <p>16 And then they come up with</p> <p>17 intervention plans to address that, and then</p> <p>18 those reports are then turned into our student</p> <p>19 relations department.</p> <p>20 Q. Where are the school-level weekly</p> <p>21 and monthly discipline data? Where is that</p> <p>22 kept?</p> <p>23 A. That -- the data comes from Synergy,</p> <p>24 so they are able to pull a report directly from</p> <p>25 Synergy, and then there is a meeting template</p>	<p style="text-align: right;">Page 53</p> <p>1 Civil Procedure 26(A)(1)(A)(iii).</p> <p>2 And can you please turn to page 2?</p> <p>3 So this is page 3 of the exhibit, but on the</p> <p>4 bottom of the page it says number 2.</p> <p>5 Do you see where it says Second</p> <p>6 Supplemental Initial Disclosures at the top of</p> <p>7 the page?</p> <p>8 A. Yes.</p> <p>9 Q. And then looking below, it says,</p> <p>10 "Tucson Unified School District responds that,</p> <p>11 at this time, it believes its estimated</p> <p>12 approximate past compensatory damages total at</p> <p>13 least \$103,211,006."</p> <p>14 Do you see that?</p> <p>15 A. I do.</p> <p>16 Q. Okay. So these are -- the</p> <p>17 approximately 103 million, those are the</p> <p>18 monetary losses that TUSD attributes to</p> <p>19 defendants' platforms, is that correct?</p> <p>20 A. Yes.</p> <p>21 Q. Then looking at the chart that lists</p> <p>22 -- kind of gives some more detail on how those</p> <p>23 losses are broken down, are there any monetary</p> <p>24 losses that TUSD is claiming are attributed to</p> <p>25 defendants' platforms that are not listed on</p>

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<p style="text-align: right;">Page 54</p> <p>1 this chart?</p> <p>2 A. Can you repeat the question?</p> <p>3 Q. Sure.</p> <p>4 Does this chart include all of the</p> <p>5 losses that TUSD is claiming are attributed to</p> <p>6 defendants' platforms?</p> <p>7 MR. CUTLER: Object to form.</p> <p>8 You can answer.</p> <p>9 THE WITNESS: It is my understanding</p> <p>10 that as part of this litigation that this</p> <p>11 information, yes, came from our chief</p> <p>12 financial officer as he evaluated the</p> <p>13 suggested damages, yes.</p> <p>14 BY MS. DEGTAREVA:</p> <p>15 Q. So are there any monetary losses</p> <p>16 attributed to defendants' platforms that are not</p> <p>17 on this chart?</p> <p>18 A. I would imagine that it would be</p> <p>19 very difficult to put a specific dollar amount</p> <p>20 number on just given the amount of need we have</p> <p>21 in our district. I would imagine that there may</p> <p>22 be additional that might not be recognized in</p> <p>23 here, but I was not part of the stakeholder</p> <p>24 group who did this analysis to identify these</p> <p>25 numbers. I've reviewed this document, but I</p>	<p style="text-align: right;">Page 56</p> <p>1 A. So it's my understanding that TUSD</p> <p>2 legal counsel in conjunction with outside</p> <p>3 counsel and our chief financial officer. I</p> <p>4 believe those were the main stakeholders that</p> <p>5 were looking at the overall monetary value.</p> <p>6 Q. So this is divided into three</p> <p>7 categories of damages, right?</p> <p>8 A. Yes.</p> <p>9 Q. And the first one is, "Past human</p> <p>10 and financial resources estimated to have been</p> <p>11 expended in connection with the harms alleged in</p> <p>12 Complaint."</p> <p>13 Right?</p> <p>14 A. Yes.</p> <p>15 Q. All right.</p> <p>16 MS. DEGTAREVA: Let's mark tab 47</p> <p>17 as Exhibit Number 4.</p> <p>18 (Tucson-30(b)(6)-Shivanonda-4 was</p> <p>19 marked for identification.)</p> <p>20 BY MS. DEGTAREVA:</p> <p>21 Q. Ms. Shivanonda, have you seen this</p> <p>22 document before?</p> <p>23 A. Yes. I did review this with</p> <p>24 counsel.</p> <p>25 Q. SO this is titled Plaintiff's</p>
<p style="text-align: right;">Page 55</p> <p>1 could not say for certain that this would</p> <p>2 encapsulate absolutely everything.</p> <p>3 Q. Are you aware of any monetary losses</p> <p>4 that are not listed here?</p> <p>5 A. Not specifically, no.</p> <p>6 Q. And who was part of the stakeholder</p> <p>7 group that was involved in the analysis of</p> <p>8 identifying these numbers?</p> <p>9 MR. CUTLER: Object to form.</p> <p>10 THE WITNESS: Do I answer?</p> <p>11 MR. CUTLER: Yes. Unless I say --</p> <p>12 instruct you not to, my objection is just</p> <p>13 for the record.</p> <p>14 THE WITNESS: Okay.</p> <p>15 MR. CUTLER: So with my objection</p> <p>16 noted, would you mind rereading the</p> <p>17 question so you can answer?</p> <p>18 MS. DEGTAREVA: I can just restate</p> <p>19 it.</p> <p>20 MR. CUTLER: Okay. Thank you.</p> <p>21 BY MS. DEGTAREVA:</p> <p>22 Q. So you mentioned there was a</p> <p>23 stakeholder group that was involved in the</p> <p>24 analysis of putting these numbers together. Who</p> <p>25 was part of that stakeholder group?</p>	<p style="text-align: right;">Page 57</p> <p>1 Amended Answers to Defendants' Interrogatories</p> <p>2 to Tucson Unified School District (Set 3).</p> <p>3 And if we go to -- starting at</p> <p>4 page 3, you'll see there's a lengthy response</p> <p>5 that goes on to page 4 that talks about on</p> <p>6 page 4 Category 1, Category 2, and Category 3 of</p> <p>7 damages.</p> <p>8 Do you see that?</p> <p>9 A. I do.</p> <p>10 Q. So did you play any role in</p> <p>11 preparing this response?</p> <p>12 A. I believe I did. I believe in the</p> <p>13 beginning of the litigation I did meet with</p> <p>14 outside counsel and inside counsel as we began</p> <p>15 to start to talk through who may have been</p> <p>16 involved.</p> <p>17 So, for example, we talked about</p> <p>18 potentially --</p> <p>19 MR. CUTLER: I'm going to stop you</p> <p>20 there. And to the extent you're talking</p> <p>21 about the discussions with counsel, that's</p> <p>22 privileged. So I think there are ways</p> <p>23 to -- I think there are ways for you to</p> <p>24 respond that don't include conversations</p> <p>25 with counsel.</p>

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<p style="text-align: right;">Page 58</p> <p>1 THE WITNESS: Okay.</p> <p>2 BY MS. DEGTYAREVA:</p> <p>3 Q. So without going into the substance</p> <p>4 of any conversations you had with your counsel,</p> <p>5 were you involved in preparing this response</p> <p>6 about the three different categories of damages?</p> <p>7 A. I believe I may have been in initial</p> <p>8 conversations in preparation for this overall.</p> <p>9 Q. And then on page 4 of this document</p> <p>10 where it talks about Category 1 of damages,</p> <p>11 that's referring to the past human financial</p> <p>12 resources that we were just looking at in the</p> <p>13 other document, right?</p> <p>14 A. I believe so.</p> <p>15 Q. And so you see it lists a number of</p> <p>16 types of damages that fall into this category.</p> <p>17 Were you involved in identifying the types of</p> <p>18 damages that are included in Category 1?</p> <p>19 A. I believe in initial conversations</p> <p>20 with counsel I believe I did contribute, yes.</p> <p>21 Q. So do you remember which of these</p> <p>22 categories you identified?</p> <p>23 THE WITNESS: Would that be</p> <p>24 privileged?</p> <p>25 MR. CUTLER: Yeah, I mean, I think</p>	<p style="text-align: right;">Page 60</p> <p>1 identified costs associated with certain staff,</p> <p>2 including teachers, assistant principals,</p> <p>3 principals, and staff providing mental health</p> <p>4 and related student support services."</p> <p>5 Do you see that?</p> <p>6 A. Mm-hmm.</p> <p>7 Q. What does "related student support</p> <p>8 services" refer to here?</p> <p>9 A. I was not the person who created</p> <p>10 this document, so I can't speak to what the</p> <p>11 intention was. In general, providing mental</p> <p>12 health and related student support services,</p> <p>13 there's a lot that goes into the need of mental</p> <p>14 health.</p> <p>15 We -- mental health could also</p> <p>16 trigger outwardly behavioral incidences, and so</p> <p>17 some potential support student services might be</p> <p>18 creating of intervention plans, might be</p> <p>19 coaching and training and supporting staff, in</p> <p>20 supporting students, might be also looking at</p> <p>21 overall classroom environment, overall school</p> <p>22 climate and culture, and overall support of</p> <p>23 student services.</p> <p>24 So could be a multitude -- a</p> <p>25 multitude of things wrapped in that.</p>
<p style="text-align: right;">Page 59</p> <p>1 to the extent that you're having</p> <p>2 conversations with counsel where you're</p> <p>3 identifying things, that's privileged.</p> <p>4 BY MS. DEGTYAREVA:</p> <p>5 Q. Ms. Shivanonda, let me ask you this.</p> <p>6 Are you aware of any other types of</p> <p>7 damages that are not listed here that would fall</p> <p>8 within what's called Category 1?</p> <p>9 (Witness reviewing document.)</p> <p>10 A. I amassed -- this is pretty robust.</p> <p>11 However, there's, you know, a multitude of ways</p> <p>12 that we've identified harm. Off the top of my</p> <p>13 head I can't speak to specifics, but I imagine</p> <p>14 that there could potentially be additional.</p> <p>15 It's hard to quantify all of the ways and all of</p> <p>16 the things that we're seeing in the district.</p> <p>17 Q. So sitting here today are you aware</p> <p>18 of any other types of damages that are not</p> <p>19 included in this response?</p> <p>20 (Witness reviewing document.)</p> <p>21 A. Off the top of my head at the</p> <p>22 moment, no.</p> <p>23 Q. Okay. And then it says in the</p> <p>24 second paragraph on page 4 that, "In calculating</p> <p>25 damages associated with Category 1, Plaintiff</p>	<p style="text-align: right;">Page 61</p> <p>1 Q. And so then the staff positions that</p> <p>2 sort of fall into these categories are listed in</p> <p>3 Exhibit 1 of this document, right? And if you</p> <p>4 can turn a couple of pages on, you'll see it</p> <p>5 says Exhibit 1, and there's a chart after it.</p> <p>6 Do you see that chart on the first</p> <p>7 page of Exhibit 1 and another chart on the</p> <p>8 second page of Exhibit 1?</p> <p>9 A. Yes, I see that.</p> <p>10 Q. Are those all of the staff positions</p> <p>11 that fall within sort of these Category 1</p> <p>12 damages?</p> <p>13 A. I do know that in the creation of</p> <p>14 this document a lot of discussion was around. I</p> <p>15 don't know 100 percent certain that this would</p> <p>16 be an exhaustive list.</p> <p>17 Again, it's very intricate in the</p> <p>18 way that our school districts are created and</p> <p>19 who may be collaborating to support. This does</p> <p>20 look like a fairly comprehensive list, but it</p> <p>21 may or may not be completely exhaustive.</p> <p>22 Q. So looking at the first chart in</p> <p>23 Exhibit 1 of this document, who was responsible</p> <p>24 for selecting the positions to include in this</p> <p>25 chart?</p>

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<p style="text-align: right;">Page 62</p> <p>1 MR. CUTLER: I'm going to object to</p> <p>2 the extent that this was covered in the</p> <p>3 prior deposition and answered.</p> <p>4 But you can answer.</p> <p>5 BY MS. DEGTAREVA:</p> <p>6 Q. Who was responsible for selecting</p> <p>7 the positions included in this chart?</p> <p>8 A. It was my understanding that</p> <p>9 internal legal counsel, external legal counsel,</p> <p>10 collaboration with chief financial officer. I'm</p> <p>11 not sure at what and how -- what capacity our</p> <p>12 superintendent may have been involved, but the</p> <p>13 majority of this was determined with counsel,</p> <p>14 again within preliminary discussions that I was</p> <p>15 part of with counsel, also different</p> <p>16 departments, we kind of identified who in our</p> <p>17 departments may be providing support, so I think</p> <p>18 that also influenced these lists.</p> <p>19 Q. Did you provide input into what</p> <p>20 positions should be included here?</p> <p>21 A. I did. So based on any of the</p> <p>22 positions that may be connected to my particular</p> <p>23 department, yes.</p> <p>24 Q. And so what did TUSD do to determine</p> <p>25 that each of these positions was in some ways</p>	<p style="text-align: right;">Page 64</p> <p>1 And so because of that, it can get</p> <p>2 somewhat cumbersome to identify, so the majority</p> <p>3 of the staff on our school campuses would be</p> <p>4 somehow connected in supporting the overarching</p> <p>5 whole child needs of all of our students.</p> <p>6 Q. So did you -- does this list include</p> <p>7 essentially every staff member that supports the</p> <p>8 overarching whole child needs of their students?</p> <p>9 MR. CUTLER: Object to form.</p> <p>10 THE WITNESS: Can you -- on the</p> <p>11 tablet, can you go to the second page and</p> <p>12 make it bigger for me? This one is very</p> <p>13 hard to read.</p> <p>14 BY MS. DEGTAREVA:</p> <p>15 Q. The writing is very small.</p> <p>16 A. Okay.</p> <p>17 (Witness reviewing document.)</p> <p>18 A. So all of these staff would</p> <p>19 absolutely support. There's -- there actually</p> <p>20 are probably some staff on here that are not</p> <p>21 indicated that I think could be.</p> <p>22 So when a student comes to a campus,</p> <p>23 there's a multitude of staff members that</p> <p>24 they're going to potentially engage in. We're</p> <p>25 not sure, you know, if a student is going to</p>
<p style="text-align: right;">Page 63</p> <p>1 impacted by defendants' platforms?</p> <p>2 MR. CUTLER: Object to form.</p> <p>3 BY MS. DEGTAREVA:</p> <p>4 Q. You can answer.</p> <p>5 A. As we look at our overall operating</p> <p>6 procedures in the district, we identify specific</p> <p>7 staff members that provide specific resources</p> <p>8 and supports to students in our school</p> <p>9 community.</p> <p>10 The majority of the employees listed</p> <p>11 on these lists do in some capacity provide</p> <p>12 behavioral support, instructional support. The</p> <p>13 difficulty in kind of parsing that out is that</p> <p>14 within a school district system if a student,</p> <p>15 for example, goes to the health office for a</p> <p>16 stomachache, that could mean that they have a</p> <p>17 stomachache, it could mean that they're going to</p> <p>18 the health office every day in math because they</p> <p>19 have math anxiety.</p> <p>20 And so then the health assistant</p> <p>21 would then potentially collaborate with other</p> <p>22 staff within the school system to then determine</p> <p>23 whether or not it was an academic issue, whether</p> <p>24 it was a physical issue, whether it was a mental</p> <p>25 health issue, or a behavioral issue.</p>	<p style="text-align: right;">Page 65</p> <p>1 connect with the office manager, for example.</p> <p>2 Or they're crossing the crosswalk so they might</p> <p>3 also make a connection with the crossing guard.</p> <p>4 They might also, you know, share something about</p> <p>5 their day or how they're feeling with a crossing</p> <p>6 guard.</p> <p>7 So the reality is that students</p> <p>8 might make a connection with an adult on the</p> <p>9 school campus, and so there are probably other</p> <p>10 people represented on here that may also be</p> <p>11 involved in the support of the overarching needs</p> <p>12 of our children.</p> <p>13 I think this is a pretty significant</p> <p>14 list, but I would imagine there's probably</p> <p>15 additional people that we also could lean into</p> <p>16 to say that some of their work would also be</p> <p>17 supporting student overall mental health.</p> <p>18 Q. Okay. So it's your understanding,</p> <p>19 though, that this list includes the positions</p> <p>20 that are involved in supporting the overarching</p> <p>21 needs of the students?</p> <p>22 A. Yes, this list does that, and then</p> <p>23 there might be others that are missing.</p> <p>24 Q. Now, if you go back to -- actually,</p> <p>25 sorry, staying on these two charts, you'll see</p>

<p style="text-align: right;">Page 66</p> <p>1 that both charts start with school year 16-17, 2 2016-2017? 3 A. Mm-hmm. 4 Q. What's the basis for starting these 5 calculations at school year 2016-2017? 6 MR. CUTLER: I will object. This 7 was asked and answered earlier as well. 8 But you can answer. 9 BY MS. DEGTYAREVA: 10 Q. You can answer. 11 A. Again, from my understanding, what 12 we talked about before, we -- as we started to 13 see an increase in the need, an increase in use 14 of cellphones and social media started right 15 around anywhere from 2014, 2015, 2016. So I 16 think 2016 is a pretty good basis in terms of 17 when we really started to see a spike in needs 18 of students. 19 Q. And you say 2016 is when you 20 "started to see a spike in needs of students." 21 What data does TUSD have that shows that spike 22 in the needs of students? 23 A. So again multiple -- multitude of 24 data points. Again, some of the data we may not 25 be able to explicitly access now due to shifts</p>	<p style="text-align: right;">Page 68</p> <p>1 BY MS. DEGTYAREVA: 2 Q. In preparing to testify for the 3 deposition today, did you review any 4 districtwide data that showed there was a spike 5 in the needs of students starting around the 6 2016-2017 school year? 7 A. Not from 2016, due to the shift in 8 and because of the data breach, so I wasn't able 9 to see that. 10 Q. Now, going back -- so in this 11 document, going back to page 4, in the second 12 paragraph you'll see it says -- after it 13 identifies the types of staff that were 14 included, it says, "A percentage was then 15 applied to each staff category or position for 16 each respective year to reach an approximate 17 total of this category of damages." 18 Do you see that? 19 A. I do. 20 Q. So then if we go back to Exhibit 1, 21 to the two charts we were looking at, in both 22 charts there's a column that says Weight, and 23 then it has a percentage. 24 Do you see those columns? 25 A. I do.</p>
<p style="text-align: right;">Page 67</p> <p>1 in data reporting. 2 I can just say from my personal 3 experience when I was working in a school in 4 2016 -- I was at a middle school in 2016 -- I 5 regularly would engage with students, behavioral 6 and social emotionally, due to the use of social 7 media. And so from my personal experience I can 8 say that just from my work with students we did 9 see a significant increase in around 2015, 2016. 10 Q. What districtwide data -- so not 11 specific to just one middle school, but what 12 districtwide data does TUSD have that shows that 13 there was a spike in the needs of students 14 around 2016? 15 MR. CUTLER: Object to form. 16 THE WITNESS: We do have discipline 17 data that spans, you know, the years, we 18 do collect that data, so whether or not we 19 could access the Mojave data prior to 20 moving to into Synergy. 21 But, again, discipline data does 22 show connections between the use of 23 student devices and technology and 24 increase in behavioral instances on our 25 campuses.</p>	<p style="text-align: right;">Page 69</p> <p>1 Q. How did TUSD calculate the 2 percentage to put in the Weight columns? 3 MR. CUTLER: Object to form. Asked 4 and answered. 5 You can answer. 6 THE WITNESS: So as we look at again 7 these particular positions, really looking 8 at the purpose of the position and then 9 potentially the amount of time spent, 10 again, in preparation for the litigation 11 with internal and outside legal counsel, 12 different departments did provide input 13 around which positions may be included, 14 and how much of that work would be 15 potentially connected to the litigation. 16 BY MS. DEGTYAREVA: 17 Q. So you said looking at "the amount 18 of time spent." Does TUSD have any data showing 19 the amount of time that each of these positions 20 spends on issues related to social media? 21 A. There may be some. So not all of 22 our positions are required to clock in and out, 23 not a lot of our -- not all of our positions are 24 required to collect data around minute by minute 25 or hour by hour.</p>

<p style="text-align: right;">Page 70</p> <p>1 Anecdotally as we have discussions 2 and department leaders do know what their 3 employees are working on, utilizing evaluation 4 processes, strategic planning, action plans, 5 different departments are able to ascertain the 6 level of work that their individual employees 7 are doing, and so that was a big part of it. 8 Q. Has TUSD conducted any analysis to 9 show how much time each of these positions 10 spends on issues related to defendants' 11 platforms? 12 MR. CUTLER: Object to form. 13 THE WITNESS: I'm not aware of any 14 explicit analysis. 15 BY MS. DEGTAREVA: 16 Q. Has TUSD collected these sort of 17 different data sources you mentioned, evaluation 18 processes, strategic planning, has TUSD 19 collected that information to try to analyze the 20 amount of time spent? 21 MR. CUTLER: Object to form. 22 THE WITNESS: As the district as a 23 whole, I know it's the expectations of 24 each individual department to develop 25 those and manage those. As the district</p>	<p style="text-align: right;">Page 72</p> <p>1 culture data, that was definitely an 2 influencing factor in the creation. 3 In the school counseling department, 4 the decision to apply for the Arizona 5 Department of Ed school safety grant to 6 increase the number of school counselors 7 and social workers, and those school 8 counselors and social workers are 9 indicated on this list, was influenced 10 again by the overarching anecdotal data, 11 disciplinary data. 12 Again, that connection to social 13 media and what we were seeing in the 14 increase of anxiety and depression and 15 overall mental health supports needed in 16 our school campuses was heavily influenced 17 due to social media. 18 BY MS. DEGTAREVA: 19 Q. You mentioned several times, you 20 know, overall mental health support and social 21 emotional mental health needs of students. 22 Which positions on these charts does TUSD allege 23 were created specifically because of defendants' 24 platforms, not overarching mental health, but 25 specifically because of defendants' platforms?</p>
<p style="text-align: right;">Page 71</p> <p>1 as a whole, I'm not aware that there's 2 been any sort of explicit collection 3 protocol for collecting that and then 4 doing any deep dive of analysis. 5 BY MS. DEGTAREVA: 6 Q. Does TUSD allege that any of the 7 positions listed on these two charts were 8 created specifically because of defendants' 9 platforms? 10 MR. CUTLER: Objection. Asked and 11 answered. 12 THE WITNESS: So there's been -- 13 social media platforms have definitely 14 influenced. So again looking at the 15 overarching needs of the district, I can 16 speak to my particular department, and my 17 position was explicitly created to address 18 the explicit social emotional mental 19 health needs of our students, which I know 20 was also heavily influenced based on the 21 data. 22 And as we've seen with social media 23 being kind of that through line between -- 24 through a lot of our data, especially our 25 discipline data, our school climate and</p>	<p style="text-align: right;">Page 73</p> <p>1 MR. CUTLER: Objection. Asked and 2 answered. 3 You can answer again. 4 THE WITNESS: Social media platforms 5 highly influence the anxiety, the 6 depression, body dysmorphia. We've seen 7 an increase in disciplinary needs due to 8 social media, due to students creating 9 profiles and posting about fights which 10 are then disrupting the classroom 11 environment. 12 And so the influence of social media 13 is an identified cause for needing the 14 increase of social emotional mental 15 support -- mental health supports on our 16 campuses. 17 BY MS. DEGTAREVA: 18 Q. So which specific positions were 19 created because of defendants' platforms? 20 MR. CUTLER: Objection. Asked and 21 answered. 22 THE WITNESS: On this list, without, 23 again, influenced -- right, so social 24 media and all of the other supports needed 25 due to that influenced obviously my</p>

<p style="text-align: right;">Page 74</p> <p>1 position as well as my SEL coordinator 2 within PD. Counselors, right, I talked 3 about increased number of counselors due 4 to that. 5 It's difficult to also say because 6 these positions, also, they support in 7 other ways, but we've also identified the 8 need for maybe additional positions and 9 supports because of that. 10 Restorative practice facilitators, I 11 know that at least 70 percent of their 12 work generally is in response to some sort 13 of social media in terms of having to 14 restore relationships between students on 15 campus. So I know a lot of that work, 16 whether or not that was created 17 specifically because of social media, I 18 know it was highly influenced because, 19 again, it's based on data. 20 So all of the practices that the 21 district employs in identifying the 22 employees and the positions that are 23 needed are based on data sources and 24 practices, and the majority of that is 25 influenced by the social media increase.</p>	<p style="text-align: right;">Page 76</p> <p>1 the first list, increase in the need of 2 these positions are, again, highly 3 influenced because of the social media 4 that is creating numerous problems on our 5 school campuses. 6 BY MS. DEGTYAREVA: 7 Q. So I just want to make sure I 8 understand your testimony. 9 Is your testimony that your 10 department, social emotional learning 11 department, that was created specially because 12 of defendants' platforms? 13 A. It was highly influenced due to 14 social media platforms, yes. 15 MS. DEGTYAREVA: We've been going, I 16 think, over an hour. Maybe now is a good 17 time for a break. 18 MR. CUTLER: Sure. 19 THE VIDEOGRAPHER: We are going off 20 record. The time is 3:24. 21 (Whereupon, a recess was taken.) 22 THE VIDEOGRAPHER: We're going back 23 on record. The time is 3:39. 24 BY MS. DEGTYAREVA: 25 Q. Okay. Ms. Shivanonda, I'd like to</p>
<p style="text-align: right;">Page 75</p> <p>1 BY MS. DEGTYAREVA: 2 Q. Ms. Shivanonda, I'm not asking which 3 positions spend some amount of time relating to 4 social media, but are you aware of any position 5 on these lists that was created specifically 6 because of defendants' platforms? 7 MR. CUTLER: Objection. Asked and 8 answered. 9 You can answer again. 10 THE WITNESS: It's again -- it's 11 highly influenced, right. Social media is 12 a high connection point to the increase in 13 social emotional needs of our students. 14 So my position in my department was, 15 again, highly influenced because of the 16 need of the support for anxiety, 17 depression, social emotional learning 18 needs on our campuses which we have 19 identified as an increased need due to the 20 connection to social media. 21 So in a roundabout way I guess my 22 department definitely would have been 23 created, again, because of the influence 24 of the social media platforms. 25 Again, the increase of potential, on</p>	<p style="text-align: right;">Page 77</p> <p>1 move on to a slightly different topic. 2 Does TUSD have any data on how many 3 of its students have cellphones? 4 A. That is not the type of data that we 5 generally would collect. 6 Q. How about data on how many students 7 have tablets? 8 A. The district has data around 9 district-provided devices, the number of 10 devices, but we do not track the number of 11 student personal devices, no. 12 Q. Is it your understanding that for 13 many TUSD students they would get cellphones or 14 tablets or other electronic devices from their 15 parents? 16 MR. CUTLER: Object to form. 17 THE WITNESS: That would be my 18 understanding. 19 BY MS. DEGTYAREVA: 20 Q. Does TUSD have any data on the 21 amount of time that students spend on their 22 cellphones or non-school-district-issued 23 devices? 24 A. So that can be tricky. We don't 25 have specific survey data. We have anecdotal</p>

20 (Pages 74 - 77)

<p style="text-align: right;">Page 78</p> <p>1 data. We can also look at discipline data. 2 So, again, going back to the code of 3 conduct, if any students have been disciplined 4 for improper use of technology, we would have 5 that data. 6 Q. Just to be clear, I'm not asking 7 about data on how many times or how much time 8 students have been disciplined for using 9 cellphones, but just data on how often they use 10 their cellphone, at home, at school, in 11 violation of policy, not in violation of policy. 12 A. So for -- obviously the violation of 13 policy would be indicated within our discipline 14 policies. I do know that the district may have 15 some anecdotal data around asking, you know, 16 teachers potentially on, you know, how often 17 they may be asking students to put away a 18 cellphone. 19 I do know, as part of preparation 20 for the litigation, potentially asking of some 21 students of how often they use cellphones, but 22 explicit data, that's not something that the 23 district is able to collect on a regular basis. 24 Q. That anecdotal data, so starting 25 with asking teachers, is that data tracked</p>	<p style="text-align: right;">Page 80</p> <p>1 talking through that, but I don't have explicit, 2 you know, written documentation around. 3 Q. I think -- and if I misunderstood 4 you earlier, please let me know, but I thought 5 you said that TUSD asks some students how often 6 they use cellphones, is that right? 7 A. So in the past, as we have -- again, 8 looking at data, part of the process to evaluate 9 the code of conduct, I know that the student 10 relations department did hold -- they hold -- 11 held some conversation opportunities, the 12 restorative practice facilitators at those sites 13 held conversation opportunities with students 14 around their perception of the code of conduct, 15 and I know that there were some questions around 16 the use of cellphones. I do not know whether or 17 not that data was explicitly tracked or stored 18 anywhere. 19 Q. So you don't know if that data 20 was -- the answers from those conversations were 21 recorded anywhere? 22 A. I do not, correct. 23 Q. When were those conversations held? 24 A. So there was an update to the code 25 of conduct beginning -- so there was a committee</p>
<p style="text-align: right;">Page 79</p> <p>1 anywhere anecdotally? The anecdotal data, is 2 that tracked anywhere? 3 A. Not to my knowledge explicitly. So, 4 again, through potential conversation data 5 around needs of support at schools, there's 6 anecdotal data through conversations, but to my 7 knowledge I don't believe it's explicitly 8 tracked. 9 Q. In preparing to testify today, did 10 you review any documents that talked about what 11 teachers say regarding how much time their 12 students spend on cellphones? 13 A. Explicit documented data, no. 14 Q. And then you also mentioned that 15 there might be some anecdotal data from students 16 about how much they use their cellphones. 17 What anecdotal data are you 18 referring to there? 19 A. So in -- just in conversations, I 20 know that when I, you know, talk with counselors 21 and they talk with teachers, they talk with 22 teachers about how often they're seeing students 23 on their phones, if teachers talk to students 24 about phones, that's really pervasive. Phones 25 are pervasive in our community. And so kind of</p>	<p style="text-align: right;">Page 81</p> <p>1 last spring, so spring of '25 -- '24, where the 2 student relations department was eliciting -- 3 was having conversations with students about the 4 code of conduct. So it was through that spring 5 that they were eliciting feedback on the code of 6 conduct, which also included the improper use of 7 technology. 8 Q. And how many students participated 9 in those conversations? 10 A. The focus was primarily on middle 11 and high school. I know that they were not able 12 to speak to every student. So I do not know an 13 exact number, but probably at least a couple of 14 hundred. 15 Q. Were these in-person conversations, 16 or were they responses to a written 17 questionnaire? 18 A. These were in person. So the staff 19 from the student relations department traveled 20 to the school and met with groups of students 21 that were, I believe, determined by the 22 administrator on which students were able to 23 participate. 24 Q. Were the conversations recorded, 25 video or audio recorded?</p>

21 (Pages 78 - 81)

<p style="text-align: right;">Page 82</p> <p>1 A. Not to my knowledge, no.</p> <p>2 Q. And was there a summary written</p> <p>3 about the result of those conversations?</p> <p>4 A. I believe there was a summary that</p> <p>5 was produced to be able to influence the update</p> <p>6 of the code of conduct.</p> <p>7 Q. Who wrote that summary?</p> <p>8 A. I believe it most likely would have</p> <p>9 been Anna Warmbrand.</p> <p>10 Q. And is there a -- does a copy of</p> <p>11 that summary still exist?</p> <p>12 A. I'm not sure.</p> <p>13 Q. If it did, where would it be stored?</p> <p>14 MR. CUTLER: Object to form.</p> <p>15 THE WITNESS: Most likely within her</p> <p>16 department.</p> <p>17 BY MS. DEGTYAREVA:</p> <p>18 Q. Do you know what specific questions</p> <p>19 those students were asked about social media?</p> <p>20 A. I do not know the explicit</p> <p>21 questions, no.</p> <p>22 Q. Do you know if they were asked</p> <p>23 anything specifically about any of defendants'</p> <p>24 platforms?</p> <p>25 A. I am not aware of the questions.</p>	<p style="text-align: right;">Page 84</p> <p>1 they were in?</p> <p>2 A. Again, I do not have access to that</p> <p>3 explicit data. Again, just through</p> <p>4 conversation, that overall general idea of the</p> <p>5 majority of the students did report that there's</p> <p>6 high level use of cellphones and social media.</p> <p>7 And again, the targeted audience were middle</p> <p>8 schools' and high schools' students.</p> <p>9 Q. Now, does TUSD track what websites</p> <p>10 its students visit on their cellphones or other</p> <p>11 devices that are not issued by TUSD?</p> <p>12 A. No, the district does not track</p> <p>13 student device usage.</p> <p>14 Q. Does it track what applications</p> <p>15 students have installed on their devices?</p> <p>16 A. No, we do not track that data.</p> <p>17 Q. So TUSD doesn't know if students</p> <p>18 have apps that they would use to listen to</p> <p>19 music?</p> <p>20 A. Not explicitly, no. We do not track</p> <p>21 any student-level devices unless they somehow</p> <p>22 got access to WIFI. If they were on the</p> <p>23 district WIFI, then potentially technology could</p> <p>24 probably, but I don't know if they would be able</p> <p>25 to track specific apps.</p>
<p style="text-align: right;">Page 83</p> <p>1 Q. So what were the result -- or what</p> <p>2 did the students -- I guess at a high level,</p> <p>3 what did the students say about their use of</p> <p>4 cellphones --</p> <p>5 MR. CUTLER: Object to form.</p> <p>6 BY MS. DEGTYAREVA:</p> <p>7 Q. -- during those conversations?</p> <p>8 MR. CUTLER: Sorry.</p> <p>9 THE WITNESS: Answer?</p> <p>10 MR. CUTLER: Yeah.</p> <p>11 THE WITNESS: So it's my</p> <p>12 understanding through those conversations,</p> <p>13 and again secondhand information, but</p> <p>14 students did indicate that there's a high</p> <p>15 use of cellphones, and the majority of the</p> <p>16 use from the cellphones is engaging in</p> <p>17 social media platforms, and that there's a</p> <p>18 high drive for using that use. And they,</p> <p>19 through some of the summaries, identified</p> <p>20 that -- they did identify that it was</p> <p>21 somewhat of a problem within schools and</p> <p>22 within instructional practices.</p> <p>23 BY MS. DEGTYAREVA:</p> <p>24 Q. And do you have any data on what</p> <p>25 percentage of students said that or what grades</p>	<p style="text-align: right;">Page 85</p> <p>1 Q. Is it your testimony that if the</p> <p>2 student was on the district WIFI, the school or</p> <p>3 TUSD would be able to track what apps they're</p> <p>4 using, or they would not be able to track? I'm</p> <p>5 not sure I understood.</p> <p>6 A. I'm not sure I understood my answer</p> <p>7 either.</p> <p>8 For the majority, our students are</p> <p>9 not able to access TUSD WIFI. I do know that in</p> <p>10 the technology department, the technology</p> <p>11 department is able to track district-level</p> <p>12 devices and WIFI websites and things.</p> <p>13 And so if a student would somehow be</p> <p>14 able to access TUSD WIFI, I imagine that that</p> <p>15 could have been traceable. But I don't believe</p> <p>16 that we would be able to track or trace if</p> <p>17 students have specific apps.</p> <p>18 Q. So if a student was using a personal</p> <p>19 cellphone or other device, TUSD doesn't know</p> <p>20 what apps they have on the devices?</p> <p>21 A. Correct.</p> <p>22 Q. And TUSD doesn't know what apps</p> <p>23 they're using? In other words, not just that</p> <p>24 they have them installed, but what apps they're</p> <p>25 actually using on the devices, doesn't have any</p>

22 (Pages 82 - 85)

<p style="text-align: right;">Page 86</p> <p>1 data about that?</p> <p>2 MR. CUTLER: Objection to form.</p> <p>3 THE WITNESS: The data we do have</p> <p>4 is, again, within our discipline data. So</p> <p>5 when discipline is reported, the majority</p> <p>6 of the discipline that is connected to</p> <p>7 social media does connect with platforms</p> <p>8 such as Facebook and Instagram, where we</p> <p>9 will see evidence of student postings or</p> <p>10 there will be pictures. So in that case</p> <p>11 we do have data that can track</p> <p>12 disciplinary infractions that are</p> <p>13 connected to social media.</p> <p>14 BY MS. DEGTYAREVA:</p> <p>15 Q. Does TUSD know what apps or have</p> <p>16 data showing what apps students are using while</p> <p>17 they're at home?</p> <p>18 A. No.</p> <p>19 Q. How about while they're on their</p> <p>20 lunch break?</p> <p>21 A. Again, unless there's a discipline</p> <p>22 incidence where we would have that data, no.</p> <p>23 Q. Does TUSD have data on how many text</p> <p>24 messages TUSD students send and receive? And by</p> <p>25 that I mean SMS messages or iMessages.</p>	<p style="text-align: right;">Page 88</p> <p>1 talking about their video games, teachers have</p> <p>2 conversations about, you know, their video</p> <p>3 games, asking how often they're on.</p> <p>4 Other data points that when we do</p> <p>5 engage with parents, attendance data, when we</p> <p>6 have students that are either tardy or absent, a</p> <p>7 lot of that anecdotal data, talking with parents</p> <p>8 about students being on their devices at all</p> <p>9 hours of night and not being able to get them</p> <p>10 off of their devices in order to then get up and</p> <p>11 get ready for school.</p> <p>12 But, again, outside of explicit --</p> <p>13 we don't explicitly track that, but there's</p> <p>14 other data sources that can provide some data</p> <p>15 that can inform at least, again, anecdotally the</p> <p>16 pervasiveness.</p> <p>17 Q. And just so you understand, just to</p> <p>18 bring you back to my question, I'm asking</p> <p>19 specifically about video games.</p> <p>20 A. Correct, both.</p> <p>21 Q. So not all devices, just video</p> <p>22 games.</p> <p>23 What does the anecdotal data show</p> <p>24 about how much time students spend playing video</p> <p>25 games?</p>
<p style="text-align: right;">Page 87</p> <p>1 A. No.</p> <p>2 Q. And does TUSD have data on what</p> <p>3 content might be in those SMS messages or</p> <p>4 iMessages?</p> <p>5 A. No. Not on personal devices, no.</p> <p>6 Q. Does TUSD know how many of its</p> <p>7 students play video games?</p> <p>8 A. No. That's not data we track.</p> <p>9 Q. Does TUSD know how much time</p> <p>10 students might spend playing video games?</p> <p>11 A. We don't have explicit data, but,</p> <p>12 again, through anecdotally through</p> <p>13 conversations, we have somewhat of an idea of</p> <p>14 the pervasiveness of the use of technology, yes.</p> <p>15 Q. I'm talking specifically about video</p> <p>16 games.</p> <p>17 Does TUSD know how much time</p> <p>18 students spend playing video games?</p> <p>19 A. Again, through anecdotal data,</p> <p>20 potentially through conversations, can have an</p> <p>21 idea, but, no, we don't specifically track.</p> <p>22 Q. So what is that anecdotal data about</p> <p>23 how much time students spend playing video</p> <p>24 games?</p> <p>25 A. In classrooms, when students are</p>	<p style="text-align: right;">Page 89</p> <p>1 MR. CUTLER: Object to form. Asked</p> <p>2 and answered.</p> <p>3 Answer again.</p> <p>4 THE WITNESS: Same. So similarly,</p> <p>5 so again, through anecdotal data, through</p> <p>6 conversations with students, through</p> <p>7 conversations with parents, have a pretty</p> <p>8 good idea of how often students are</p> <p>9 playing video games.</p> <p>10 BY MS. DEGTYAREVA:</p> <p>11 Q. What does the anecdotal say about</p> <p>12 how often students are playing video games?</p> <p>13 A. So I don't know that data off the</p> <p>14 top of my head, but knowing that we have those</p> <p>15 conversations, and a lot of staff, school staff,</p> <p>16 have conversations with students, it's quite</p> <p>17 frequent, especially -- and it also depends on</p> <p>18 age level. So we do see higher instances of</p> <p>19 younger elementary students engaging in video</p> <p>20 game usage versus at a high school level they're</p> <p>21 engaging in more social media-type activities.</p> <p>22 Q. I believe you testified that</p> <p>23 attendance data, attendance data might have some</p> <p>24 information on what students are doing on</p> <p>25 devices.</p>

23 (Pages 86 - 89)

<p style="text-align: right;">Page 90</p> <p>1 Did I understand that correctly?</p> <p>2 A. Again, data anecdotally. So when</p> <p>3 we -- when students are absent or when students</p> <p>4 are tardy, it is the expectation that parents</p> <p>5 will report the reasons for those absences. And</p> <p>6 oftentimes we do have parents disclose to</p> <p>7 teachers, to admin, to counselors that their</p> <p>8 child is playing video games or on their devices</p> <p>9 and struggling to get them off of those, so then</p> <p>10 it is affecting sleep, and then they have a hard</p> <p>11 time getting them up in the morning and getting</p> <p>12 them to school on time.</p> <p>13 Q. Are those parental reports saved</p> <p>14 anywhere?</p> <p>15 A. They could potentially be, again,</p> <p>16 within the student information system. When</p> <p>17 counselors or administrators talk with parents,</p> <p>18 we do have a place called Student Conference</p> <p>19 where those are housed, but, again, some of</p> <p>20 those conversations could be FERPA protected.</p> <p>21 Q. What is Student Conference?</p> <p>22 A. Student Conference is a section</p> <p>23 within Synergy. So it is a place in our student</p> <p>24 information system where support staff or</p> <p>25 administrators may collect, again, anecdotal</p>	<p style="text-align: right;">Page 92</p> <p>1 found in Student Conference?</p> <p>2 MR. CUTLER: Object to form.</p> <p>3 THE WITNESS: It could potentially</p> <p>4 be, again, if it's student-level data, so</p> <p>5 a direct conversation with a student or a</p> <p>6 direct conversation with a parent about a</p> <p>7 student.</p> <p>8 BY MS. DEGTAREVA:</p> <p>9 Q. Are there any other databases where</p> <p>10 some of this anecdotal data might be found?</p> <p>11 A. The majority of our data would be</p> <p>12 found in our student information system. So</p> <p>13 whether that be in Synergy with that Student</p> <p>14 Conference or within the MTSS platform where</p> <p>15 students -- or where teachers or staff may make</p> <p>16 observations about either behavior or academic</p> <p>17 needs of students, they would document that</p> <p>18 within the MTSS part of Synergy, but all of that</p> <p>19 data would be in our student information system.</p> <p>20 Q. The MTSS platform, is that all in</p> <p>21 Synergy, or is there a separate platform?</p> <p>22 A. It is all in Synergy, yes.</p> <p>23 Q. So is it your testimony that the</p> <p>24 Student Conference data and the MTSS portion of</p> <p>25 Synergy, all of those may contain information</p>
<p style="text-align: right;">Page 91</p> <p>1 data or data from talking to a student or</p> <p>2 talking to a parent to be able to collect that</p> <p>3 data so they have evidence of what that</p> <p>4 conversation was about.</p> <p>5 Q. And what types of conversations or</p> <p>6 anecdotal data might be recorded in Student</p> <p>7 Conference?</p> <p>8 MR. CUTLER: Object to form.</p> <p>9 THE WITNESS: So again, conference</p> <p>10 notes would be anything related to a</p> <p>11 student. So if a counselor had a</p> <p>12 conversation with a parent and a parent</p> <p>13 had concerns and they were asking for</p> <p>14 maybe more counseling services, that might</p> <p>15 be noted in the Student Conference.</p> <p>16 If a restorative practice</p> <p>17 facilitator meets with a group of students</p> <p>18 to have a -- what's called a restorative</p> <p>19 circle to restore any climate and culture</p> <p>20 needs, they would capture that potentially</p> <p>21 in Student Conference. So it's any</p> <p>22 student-level connection data.</p> <p>23 BY MS. DEGTAREVA:</p> <p>24 Q. So a lot of that anecdotal data that</p> <p>25 you've been talking about today, would that be</p>	<p style="text-align: right;">Page 93</p> <p>1 about students' use of social media?</p> <p>2 A. Correct.</p> <p>3 Q. Now, does TUSD track whether on</p> <p>4 their personal devices students have parental</p> <p>5 controls enabled?</p> <p>6 A. No.</p> <p>7 Q. And does TUSD track whether students</p> <p>8 have any screen time limits enabled on their</p> <p>9 personal devices?</p> <p>10 A. No.</p> <p>11 Q. Does TUSD track whether -- excuse</p> <p>12 me -- whether parents enforce any other types of</p> <p>13 restrictions on their children's use of devices?</p> <p>14 A. No.</p> <p>15 Q. Has TUSD ever attempted to study the</p> <p>16 prevalence of social media use by students at</p> <p>17 TUSD?</p> <p>18 A. Not explicitly that I'm aware of,</p> <p>19 no.</p> <p>20 Q. When you say "not explicitly," what</p> <p>21 do you mean by that?</p> <p>22 A. Again, as we look at our overall</p> <p>23 needs of our system, teachers may report the --</p> <p>24 to administrators, so there's oftentimes</p> <p>25 opportunities for teachers to, you know, share</p>

24 (Pages 90 - 93)

<p style="text-align: right;">Page 94</p> <p>1 concerns, right. So if there's an issue of 2 classroom management or if students are 3 disruptive, there's again conversationally data. 4 So the difficulty in a school 5 district is, a lot of the work that we do is 6 immediate and so it's a lot of conversation and 7 it's a lot of trying to kind of parse out what 8 is the reason behind some of the behaviors, and 9 so not a lot of that is tracked in any sort of 10 platform or any sort of actual, like, explicit 11 way. 12 I do know that, you know, when we 13 are looking, again, at triggers and reasons for 14 explaining maybe discipline, again, there's 15 conversational data around, Oh, I'm noticing an 16 increase of third graders that are bringing 17 their phones to school and I'm struggling to get 18 them to put them away in their backpack. So 19 then we might talk about what are the 20 interventions for that, but that's more 21 conversational at the different times within the 22 school day. 23 So there's a lot of opportunities 24 for teachers to collaborate amongst with 25 teachers and hear what they're seeing and what</p>	<p style="text-align: right;">Page 96</p> <p>1 administrators to kind of analyze and 2 investigate some of those concerns. 3 But, otherwise, no, like a lot of 4 our work, it really does -- it's really 5 anecdotal. It's through conversations of 6 identifying, This is what I'm seeing, this 7 is, you know, the support that I might 8 need, and then coming together with teams, 9 then potentially, you know, reaching out 10 to district departments to provide maybe 11 some professional development or some 12 other supports and resources as needed. 13 BY MS. DEGTYAREVA: 14 Q. So the Awareity data that you just 15 talked about, is that sort of an example of some 16 of the anecdotal data that you might have? 17 A. Awareity could be more of the, like, 18 explicit data in terms of the reporting of 19 concerns. So parents and community members have 20 access to that to report, 21 teachers/administrators have access to that to 22 report. But outside of that and our particular 23 discipline data, a lot of, like I said, the 24 anecdotal comes from conversation. 25 Q. So you've talked a lot about</p>
<p style="text-align: right;">Page 95</p> <p>1 their needs are, then that may come up to the 2 level of the administrators. And then at the 3 district level again we look at overarching data 4 points such as discipline, so what are we seeing 5 in our schools based on the discipline. 6 And again that could potentially be 7 conversations with administrators, conversations 8 with teachers that are not necessarily 9 documented anywhere. 10 Q. So you talked about teachers 11 reporting concerns to administrators. Are those 12 ever documented somewhere? 13 MR. CUTLER: Objection to form. 14 THE WITNESS: Again, they could 15 potentially. We don't necessarily have a 16 specific process for teachers for 17 concerns. 18 There is a platform within the 19 district called Awareity where -- it's a 20 digital resource where anyone in the 21 community can either report anonymously or 22 non-anonymously any concerns that they may 23 have, and so those would then go to the 24 regional assistant superintendents, and 25 then they would work with the</p>	<p style="text-align: right;">Page 97</p> <p>1 anecdotal data and conversations. Does TUSD 2 have data on a specific -- what specific 3 percentage of its students use defendants' 4 platforms? 5 MR. CUTLER: Objection. Asked and 6 answered. 7 Go ahead, answer again. 8 THE WITNESS: No, we do not. We're 9 not able to track. So, again, we don't 10 have any access to personal devices of 11 students, so we're not able to track 12 how -- what platforms they're using and 13 how often. 14 BY MS. DEGTYAREVA: 15 Q. And you've also talked today about 16 social media. Does TUSD have any data on how 17 many students use social media applications that 18 are not defendants' platforms? 19 A. Again back to, again, our discipline 20 data, right. So when we look at disciplinary 21 action, if there's a fight, if there's an 22 aggressive act, if there's improper use of 23 technology, that would be potentially indicated 24 in that data, whatever platform that is being 25 used.</p>

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<p style="text-align: right;">Page 98</p> <p>1 I don't know that we've done a deep 2 dive into identifying all of the -- which of the 3 platforms are used, we just know that the 4 majority of the platforms that are available we 5 are seeing in high levels of instances of 6 discipline. 7 Q. So you mentioned, sort of, "the 8 majority of the platforms that are available." 9 Are you referring to specific platforms there? 10 A. Well, the reality is that there's 11 new platforms that are popping up on a regular 12 basis, so we are seeing instances of any of the 13 available social media platforms that students 14 may be accessing. We have seen evidence of 15 those being used within our disciplinary data. 16 Q. So have you, for example, seen -- or 17 have you seen evidence of students using 18 Discord? 19 A. Yes. 20 Q. How about X, or formerly Twitter? 21 A. Yes. 22 Q. BeReal? 23 A. Yes. 24 Q. Reddit? 25 A. I'm not aware of Reddit being used</p>	<p style="text-align: right;">Page 100</p> <p>1 reporting, you know, students are interrupting 2 class time and going into other classrooms that 3 they're not supposed to be in because they've 4 seen evidence of, Oh, hey, there's going to be a 5 fight here, this was posted here, we saw this 6 video. 7 So, again, outside of discipline 8 data, we are also able to see the anecdotal data 9 of around all the other students that can be 10 involved based on the use of the social media 11 platforms. 12 Q. Does TUSD have any data showing how 13 much time students spend on the different types 14 of activities that they could be doing on 15 defendants' apps -- or on defendants' platforms? 16 MR. CUTLER: Object to form. 17 THE WITNESS: No, not explicitly. 18 BY MS. DEGTAREVA: 19 Q. Does TUSD have data on which 20 features of defendants' platforms its students 21 use? 22 A. Not for -- no. 23 Q. So does TUSD, for example, know how 24 much time its students spend messaging their 25 friends and family?</p>
<p style="text-align: right;">Page 99</p> <p>1 very often, but potentially. 2 Q. Does TUSD have any data on the 3 amount of time that its students spend on any 4 specific social media site? 5 A. Not that I'm aware. 6 Q. And does TUSD have any data on how 7 much time its students spend specifically on 8 defendants' platforms as opposed to any other 9 social media sites? 10 A. Outside of, again, discipline 11 reporting and conversations with students about, 12 you know, what they're doing on social media, 13 no, we are not explicitly tracking that outside 14 of discipline. 15 Q. So, again, outside of discipline, 16 does TUSD have any data on what students do when 17 they're on social media apps? 18 A. Well, I mean, outside of discipline 19 -- we may or may not have discipline instances, 20 but we are seeing evidence of social media use 21 when students are, you know, videoing a fight on 22 campus and then posting it to a Facebook fight 23 page, and then other students are congregating 24 around and having ongoing conversations. 25 Again, anecdotally teachers are</p>	<p style="text-align: right;">Page 101</p> <p>1 A. No. 2 Q. Or how much time students spend 3 creating their own content? 4 A. If it's, again, connected to 5 discipline, if students are caught with their 6 phones on a campus, then we might have that 7 data, but overall the amount of time, no. 8 Q. Does TUSD have any data on how much 9 time its students spend watching educational 10 content on defendants' platforms? 11 A. No. 12 Q. Has TUSD ever attempted to study the 13 prevalence of harms that are allegedly 14 associated with students' social media use in 15 TUSD? 16 MR. CUTLER: Object to form. 17 THE WITNESS: Can you repeat the 18 question? 19 BY MS. DEGTAREVA: 20 Q. Sure. 21 Has TUSD ever attempted to study the 22 prevalence of harms that are allegedly 23 associated with students' social media use in 24 TUSD? 25 MR. CUTLER: Same objection.</p>

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<p style="text-align: right;">Page 102</p> <p>1 THE WITNESS: Again, I would say 2 through analysis of needs in our school 3 system. An explicit survey or an explicit 4 analysis, not necessarily, but through 5 things like the conversations with 6 students around adjusting the code of 7 conduct. 8 And when we, you know, do talk to 9 teachers about, like, what are the needs 10 and the concerns within the school system 11 in our behavior management team meetings 12 and looking at that discipline-level data, 13 some, you know, evidence of analysis can 14 be connected and developed as we, as a 15 whole, as a district, attempt to respond 16 and identify the interventions that might 17 need to be put in place. 18 But anything formal, I am not aware 19 that we've conducted anything explicitly 20 formal that we would be able to provide a 21 report on. 22 BY MS. DEGTYAREVA: 23 Q. So when you say that some analysis 24 can be developed, what analysis are you talking 25 about?</p>	<p style="text-align: right;">Page 104</p> <p>1 data when we're looking at from school to 2 school. 3 So we have 88 schools plus a virtual 4 school that all of them are going to have 5 different needs, and so, again, looking at 6 collective data points trying to get a better 7 idea of what the school systems need to then 8 better be able to ensure that we're meeting 9 those needs to the best of our ability. 10 Q. Has TUSD ever conducted this type of 11 analysis of soft data? 12 A. I mean, it's ongoing. We do it all 13 of the time. So all of our schools, again, 14 every school creates, you know, targeted plans 15 for how they're going to address and support 16 their school climate and culture. 17 One thing that we did recognize 18 through, again, that soft data was the need for 19 PBIS, positive behavior intervention supports, 20 on all of our school campuses. And so I do know 21 that our student relations department was tasked 22 with ensuring that every school received four 23 hours of professional development, and that was 24 in the '23-'24 school year, so deploying their 25 staff to provide ongoing training on how to</p>
<p style="text-align: right;">Page 103</p> <p>1 A. Again, review of data. So, again, 2 review of the discipline practices, review of 3 talking with teachers of what are we seeing on 4 campus, how often are, you know, students 5 interrupting classrooms because of use of social 6 media; when we look at school safety data, the 7 number of times, you know, school safety 8 officers were deployed to a school in relation 9 to a social media complaint or disciplinary 10 infraction. 11 Kind of that overall collective 12 identify what is happening in our system, we 13 pride ourselves in keeping our thumb on the 14 pulse of what's happening in our system to then 15 drive the operations and the policies in order 16 to better support our schools and community. 17 Q. So has TUSD ever conducted such an 18 analysis of review of data? 19 A. Like I said, we've not explicitly 20 created any sort of report. Again, through our 21 operation, that's just kind of the way that the 22 school district works, is we're not set up in a 23 way to explicitly collect hard data on a regular 24 basis, the majority of the school district 25 operating as what we would consider, like, soft</p>	<p style="text-align: right;">Page 105</p> <p>1 implement positive behavior intervention systems 2 on school campuses, how to train and support 3 teachers in how to respond to behaviors. 4 So those kind of soft data then turn 5 into practices where we then identify supports 6 needed. 7 Q. You mentioned that every school 8 creates targeted plans. Are those plans 9 documented somewhere? 10 A. So every administrator does go 11 through an evaluation process with their 12 supervisor, the regional assistant 13 superintendent, and part of that evaluation is 14 to create action plans based on school-level 15 data. 16 Q. And so are those action plans 17 documented somewhere? 18 A. I imagine they would be with the 19 regional assistant superintendents. 20 Q. So each regional assistant 21 superintendent would have the action plans for 22 the school they're assigned to? 23 A. It's part of the evaluation process 24 for the school administrator, so, yes, it would 25 be part of that evaluation.</p>

<p style="text-align: right;">Page 106</p> <p>1 Q. And you also gave the example of how 2 you recognize the need for PBIS using soft data. 3 Was there an analysis conducted and documented 4 that then led you to the conclusion that you 5 need PBIS? 6 A. No. Again, through conversations 7 and then identifying the overarching need, as we 8 again look at overall school discipline data, 9 recognizing -- and then, again, just through 10 conversational data on the number of students 11 needing to go see the school counselor, the 12 number of students that are needing additional 13 support, that kind of soft data drove us to the 14 explicit practices to ensure we were providing 15 things like professional development for our 16 staff. 17 Q. So is there any documentation of all 18 of this review that you did of the various soft 19 data? 20 A. I don't know that that's explicitly, 21 you know, at the district level where we're, 22 again, creating hard data. The data would be in 23 the practice, so then the practice of 24 implementing the PBIS would be probably the 25 closest amount of hard data that we would be</p>	<p style="text-align: right;">Page 108</p> <p>1 with discipline data, to then identify 2 what are the additional supports that are 3 needed on the school campus. 4 BY MS. DEGTAREVA: 5 Q. Does the school quality survey, does 6 that include questions about social media use? 7 A. The school quality survey is about 8 60 questions long, and I'm not recalling the 9 exact questions off the top of my head. 10 BY MS. DEGTAREVA: 11 Q. Where would copies of those survey 12 responses be saved? 13 MR. CUTLER: Object to form. 14 THE WITNESS: That would be 15 internal, internal data sources with 16 our -- within the district. 17 BY MS. DEGTAREVA: 18 Q. Which data sources? 19 A. Our assessment and evaluation 20 department, they collect and house that data, 21 and then it is shared with school-level 22 personnel. 23 Q. Is there a database they use to 24 collect and house it? 25 A. Yes. So there's a TUSD database</p>
<p style="text-align: right;">Page 107</p> <p>1 able to produce. 2 Q. You mentioned -- you've been talking 3 about things at the district level at times. 4 Has there been any analysis done at the 5 individual school level? 6 MR. CUTLER: Object to form. 7 Go ahead. 8 THE WITNESS: So the district does 9 regularly review different data points. 10 So we've talked about in my 11 preparation of looking at our publicly 12 available school letter grades, so looking 13 at, you know, based on school letter 14 grades per school, what, you know, are the 15 overall responsibility of the school and 16 supports that are needed, similarly to, 17 again, behavioral data. 18 And then also our district does 19 employ a school quality survey, so we 20 survey students, staff, and community 21 members on a yearly basis, so that data 22 would then drive supports needed at 23 potential individual schools. 24 We do ask schools to review that 25 data on a regular basis and then -- along</p>	<p style="text-align: right;">Page 109</p> <p>1 that is utilized, yes. 2 Q. And what is that called? 3 A. Called TUSD Web Data. 4 Q. What other types of data are in TUSD 5 web data? 6 A. School letter grades, attendance 7 data. I'm not sure if discipline data is there. 8 Academic data, so the -- my brain is fried. 9 It's now called AASA, it used to be called AZ 10 Merit, the national testing that we do in the 11 country that we're required to do. 12 So that's that yearly data, you 13 know, ACT data, and then the district also has 14 quarterly benchmarks, academic benchmarks, and 15 so that data would also be housed in there to 16 look at the overall academic. 17 Q. And just so I'm clear, though, this 18 is a different database than Synergy? 19 A. Correct. 20 Q. Does TUSD track how many of its 21 students receive mental health treatment? 22 A. As much as -- well, we track if we 23 do any sort of referral for mental health 24 treatment. We do not track -- so that would be, 25 you know, a HIPAA violation. We don't require</p>

<p style="text-align: right;">Page 110</p> <p>1 parents to inform us of any of that. However, 2 we do have a system in place where we refer to 3 local behavioral health agencies for mental and 4 behavioral health support. 5 Q. So if a student sought out mental 6 health treatment without being referred by TUSD, 7 TUSD wouldn't have that data? 8 A. We may or may not know. 9 Q. You say you may or may not. In what 10 circumstances would you have data about a 11 student who sought mental health treatment 12 without being referred by TUSD? 13 A. If a parent disclosed that 14 information to the school district. 15 Q. And for the data on TUSD referrals 16 of mental health treatment, where is that data 17 tracked? 18 A. So that is through Arizona Complete 19 Health. We work with that agency, and they help 20 us monitor that referral data. 21 So through the social emotional 22 learning department we collaborate, we have 23 memorandums of understanding with five local 24 health -- behavioral health agencies, and every 25 one of our schools is assigned to one particular</p>	<p style="text-align: right;">Page 112</p> <p>1 additional resources that the school may be able 2 to support with. 3 Q. So for those cases where the parents 4 do disclose diagnosis data, that diagnosis data 5 is not tracked anywhere? 6 A. Only in terms of if it is then used. 7 If it's used -- if there needs to be like a 8 chronic health certification in the health 9 office or if it's used for any intervention data 10 within the MTSS system, it may be documented. 11 If it's not being used by the school in any way, 12 then, no, it would not be documented. 13 Q. Does the referral data that's 14 tracked in Arizona Complete Health system, does 15 that include the reason for the referral? 16 A. It does not. 17 Q. Does that include any information 18 about whatever interaction led to the student 19 being referred? 20 A. Not in that data. Our school 21 counselors, again, they facilitate the referral 22 process, and so if a student needs to be 23 referred, that information would be part of that 24 referral process. I believe that information 25 would be FERPA and HIPAA protected.</p>
<p style="text-align: right;">Page 111</p> <p>1 behavioral health agency. And then our school 2 counselor is the main referrer to that agency 3 with parental support, with parental permission. 4 Q. So data on every student who is 5 referred to one of those agencies is in Arizona 6 Complete Health system, is that right? 7 A. Correct. 8 Q. And what type of data is recorded in 9 that system about the referrals? 10 A. So that is just the number of 11 referrals. So due to HIPAA, we then do not 12 receive any sort of data back from the agencies 13 on whether or not students are engaging in 14 services or how often, so we just have our 15 number of referrals of students referred to 16 agencies. 17 Q. Would you receive any data on 18 whether a student is ultimately diagnosed with 19 any mental health condition? 20 A. Only in the case if there was a 21 release of information. If the parents approved 22 a release of information from the agency to the 23 school, that may be disclosed. But that is not 24 necessarily trackable data. That may just be 25 used internally at the school to identify any</p>	<p style="text-align: right;">Page 113</p> <p>1 Q. And where is the information about 2 the referral process stored? 3 A. That is within our -- in the social 4 emotional learning department operating 5 procedures in our SharePoint around what schools 6 are referred where, and then we actually connect 7 the schools with the agencies themselves, and 8 then they work directly with the agencies to 9 identify what that referral process is and 10 whether or not they have a specific referral 11 form. 12 Q. So this social emotional learning 13 department has a SharePoint that includes 14 information about why students were referred 15 to -- for mental health treatment? 16 A. No. Just the process of -- just the 17 higher-level information of which schools are 18 assigned to which organization and which agency. 19 But, no, we do not track any of that 20 reason data around why a student may or may not 21 have been referred. 22 Q. Does anyone else in TUSD track that 23 reason data? 24 MR. CUTLER: Object to form. 25 THE WITNESS: Again, the school</p>

<p style="text-align: right;">Page 114</p> <p>1 counselor with parental permission would 2 fill out the referral form that would just 3 have high-level data, would just have 4 demographic data, and it may have the 5 reason of the referral, but then the 6 majority of that information is then 7 collected by the agency itself. 8 BY MS. DEGTAREVA: 9 Q. And where are the referral forms 10 stored? 11 A. We do not store them. The 12 counselors, they complete their referral, and 13 then it is sent to the referring agency. 14 MS. DEGTAREVA: Let's mark -- what 15 exhibit number are we on? 16 MS. REAVES: 5. 17 MS. DEGTAREVA: Let's mark tab 5 as 18 Exhibit 5. 19 (Tucson-30(b)(6)-Shivanonda-5 was 20 marked for identification.) 21 BY MS. DEGTAREVA: 22 Q. Do you recognize this document? 23 A. Yes, I do. 24 Q. And if you turn to page 6 of this 25 document, you'll see question number 9. It</p>	<p style="text-align: right;">Page 116</p> <p>1 student equity services would be -- would be 2 kept within that department. It would be 3 department specific. 4 Q. So to put together this additive 5 number of student referrals, what are the 6 different databases that you would need to look 7 at? 8 A. Most likely would need to be a 9 conversation with the leader of that department 10 to collect that data. 11 Q. And what are the -- what are all the 12 departments that would have to be involved in 13 those conversations? 14 A. I am not 100 percent sure which of 15 the departments were involved in these numbers. 16 I know for sure would be school counseling, 17 potentially social work. Our social work 18 department is kind of split, so I don't know if 19 these would include any of our exceptional ed 20 students. 21 Majority of our social workers only 22 provide support to exceptional ed student. We 23 do have some general ed social workers, so that 24 may be tracked in here. And then that would 25 probably be data within our assistant</p>
<p style="text-align: right;">Page 115</p> <p>1 says, "Provide the number of students in your 2 district referred for mental health services, if 3 such referrals are tracked." 4 And then there's a chart with some 5 numbers. 6 Do you see that? 7 A. Yes. 8 Q. So does this data come from that 9 Arizona Complete Health system that we've been 10 talking about? 11 A. So this data would include that. 12 This data also would include if students are 13 referred for any mental health support services 14 on school campuses, so the number of students 15 who may have been referred to a school counselor 16 or to maybe a restorative practices facilitator 17 or a school social worker. 18 Q. And so where is that data about -- 19 if students are referred for mental health 20 support services on school campuses, where is 21 that data stored? 22 A. So that would be dependent upon the 23 department. So, for example, school counselor 24 referrals would be collected in the school 25 counselor department; referrals for maybe our</p>	<p style="text-align: right;">Page 117</p> <p>1 superintendents or regional assistant 2 superintendents. 3 Q. So each of the departments you 4 mentioned, plus the assistant superintendents or 5 regional assistant superintendents, would have 6 data about these various referrals? 7 MR. CUTLER: Object to form. Asked 8 and answered. 9 BY MS. DEGTAREVA: 10 Q. You may answer. 11 A. Yes. 12 Q. And for any of the referrals that 13 are students being referred internally for 14 mental health services within the school, does 15 TUSD have any records of why the students were 16 referred? 17 A. Most likely, again, that would 18 probably be through our multi-tiered system of 19 support process. So when students are referred 20 for additional supports, it generally goes 21 through that centralized process. 22 Q. And that would, again, be the 23 multi-tiered system support data in Synergy? 24 A. Yes. 25 Q. And then for the students who are</p>

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<p style="text-align: right;">Page 118</p> <p>1 referred to the internal school mental health 2 services, does TUSD have any data on any 3 diagnosis that they may receive from a TUSD 4 professional? 5 A. TUSD, we do not diagnose students 6 with any disorders. We are not clinicians or 7 medical staff. 8 Q. Is TUSD aware of any student who has 9 a diagnosis from a medical professional that the 10 student is addicted to social media? 11 A. I'm not sure that I can answer that 12 question. I don't know -- I don't know if that 13 is currently a diagnosis in the DSM-5. 14 Q. Are you aware of any such diagnosis 15 of a TUSD student? 16 A. I am not, but I don't know all of 17 the diagnoses of all 40,000 students across the 18 district. 19 Q. Is TUSD aware of any student who has 20 a diagnosis from a medical professional that the 21 student was harmed by social media, that their 22 mental health was harmed by social media? 23 A. That's a difficult question. Again, 24 when we're working with diagnoses, we don't 25 always know. There's FERPA and HIPAA</p>	<p style="text-align: right;">Page 120</p> <p>1 BY MS. DEGTAREVA: 2 Q. You said you often see or hear of 3 connections of social media. 4 Are you referring to information 5 that you see or hear from medical professionals? 6 A. We do actually collaborate with 7 community agencies and medical professionals and 8 have had, again, anecdotal conversations around 9 the use of social media and the harm. I've also 10 done quite a bit research around youth social 11 media and youth mental health. 12 I'm sorry. Can you repeat the 13 question? 14 Q. Sure. 15 You talked about students where 16 there was -- you see or hear of some connection 17 of social media. I'm just wondering if it's 18 your testimony that you are aware of a medical 19 professional that has identified some student in 20 TUSD whose mental health was harmed by social 21 media, some specific student. 22 MR. CUTLER: Object to form. 23 THE WITNESS: No. Again, HIPAA 24 generally prevents us in knowing direct 25 diagnoses. We are unable to generally</p>
<p style="text-align: right;">Page 119</p> <p>1 regulations in terms of being able to disclose 2 some of that information, so that would be 3 difficult for me to ascertain. We don't -- and 4 unless they have an IEP for a specific category, 5 we don't necessarily track that because that, 6 again, is HIPAA. 7 Q. So, again, sitting here today are 8 you aware of any student who has a diagnosis 9 from a medical professional that the student's 10 mental health was harmed by social media? 11 MR. CUTLER: Objection. Form, asked 12 and answered. 13 You can answer again. 14 THE WITNESS: Again, I don't know 15 student explicit numbers. I can tell you 16 that we -- and through school counseling 17 department, we know of students who may 18 have engaged in intensive either inpatient 19 or outpatient in regards to suicide 20 ideation, and through that there may be -- 21 we do often see or hear of connections of 22 social media. Do I know of any explicit 23 diagnosis? No, not off the top of my 24 head. 25 ///</p>	<p style="text-align: right;">Page 121</p> <p>1 talk with medical professionals around 2 diagnoses. 3 MS. DEGTAREVA: Okay. Let's mark 4 as -- what's this exhibit? 5 MS. REAVES: 6. 6 MS. DEGTAREVA: Let's mark as 7 Exhibit 6 tab 4. 8 THE WITNESS: I don't know if it 9 matters, but my name is spelled 10 incorrectly. 11 MR. CUTLER: That's okay. 12 (Tucson-30(b)(6)-Shivanonda-6 was 13 marked for identification.) 14 BY MS. DEGTAREVA: 15 Q. Ms. Shivanonda, are you familiar 16 with the document that's been marked as 17 Exhibit 6? 18 (Witness reviewing document.) 19 A. Yes, I am. I am aware of this. 20 Q. One moment. 21 So this is labeled Plaintiff Fact 22 Sheet - School Districts. And can you please 23 turn to page 27? 24 Do you see under question 38 it 25 says, "Health Services collects data on</p>

<p style="text-align: right;">Page 122</p> <p>1 medical-related conditions, signs, and symptoms. 2 The current electronic health record (EHR) 3 reports 'behavioral' codes and conditions only." 4 So this Health Services collects 5 data and medical-related conditions. What data 6 is that referring to? 7 A. So, again, if the diagnosis is 8 provided from parents, then -- and especially if 9 it would be considered impairing the academic 10 learning environment, this information might be 11 part of their health record, their school health 12 record. 13 Q. So the Health Services data would be 14 information that's self-reported by the parents, 15 is that right? 16 A. Yes. Parents fill out medical cards 17 or information, and then depending upon what 18 they want to include, then it will be in that 19 data. 20 Q. Is this different than the referral 21 data that we were just talking about? 22 A. Yes. 23 Q. Actually, going back to the -- just 24 a quick question on the referral data that I 25 forgot to ask you.</p>	<p style="text-align: right;">Page 124</p> <p>1 (Tucson-30(b)(6)-Shivanonda-7 was 2 marked for identification.) 3 BY MS. DEGTYAREVA: 4 Q. And tab 42, so this is an Excel 5 sheet, a large Excel sheet that could not be 6 printed. So what I'm going to pass you is just 7 a slipsheet, but the Excel itself we're going to 8 pull up on a screen. 9 A. Okay. 10 Q. And can you please go -- scroll over 11 to the tab labeled HLT 601, all the way to the 12 right. If you click on the three dots, it 13 should come up. So the three dots next to HS 14 9th grade. Yeah, there you go. HLT 601. Okay. 15 So taking a look at this tab labeled 16 HLT 601, it lists a number of conditions, codes, 17 and years. 18 Is this -- well, what is this data? 19 A. I am not familiar with this 20 spreadsheet. 21 Q. Okay. You don't know if this is the 22 same data that we were just talking about that 23 was collected by Health Services? 24 A. So I received the Plaintiff Fact 25 Sheet, but I did not review this attached Excel</p>
<p style="text-align: right;">Page 123</p> <p>1 In the chart we were just looking at 2 in the prior exhibit, it has data going back to 3 the school year of 2018 to 2019, and it says 4 data not available for 2017 through 2018. 5 Is any referral data available 6 before the 2018-2019 school year? 7 A. I am not sure. Again, we had a 8 change of platforms, and then our referral to 9 behavioral health agencies did not start until 10 2018. And, again, with the change in the 11 platforms, I cannot speak to whether or not that 12 data would be available. 13 Q. So before 2018, TUSD was not 14 referring students to outside mental health 15 services? 16 A. Not as explicitly as we are now. In 17 2018 we began the explicit MOU process. First 18 for -- so prior to that counselors may, you 19 know, work with parents and may have shared, you 20 know, here's resources available in the 21 community and they would maybe direct parents, 22 but in 2018 we began facilitating more of an 23 explicit referral process through collaboration. 24 MS. DEGTYAREVA: Let's mark as 25 Exhibit 7 tab 42.</p>	<p style="text-align: right;">Page 125</p> <p>1 spreadsheet. 2 Q. And just for the record, the Excel 3 spreadsheet is not attached. This is just a 4 different document. 5 So I'm just asking if you know 6 whether this is the same data or not. 7 MR. CUTLER: That's the question. 8 Do you know whether it is or not? 9 THE WITNESS: I do not. 10 BY MS. DEGTYAREVA: 11 Q. Okay. Do you have any idea where 12 the information in this spreadsheet that we're 13 looking at comes from? 14 MR. CUTLER: Do you need to review 15 the spreadsheet or anything? 16 THE WITNESS: That would be great. 17 Am I able to review the spreadsheet? 18 BY MS. DEGTYAREVA: 19 Q. Sure. If you want to -- is there a 20 specific tab you want to review that would be 21 helpful for you? If you can look down on the 22 bottom, there are a number of tabs. 23 A. Can you go back to maybe the first 24 tab? 25 MR. CUTLER: Can you tell her what</p>

<p style="text-align: right;">Page 126</p> <p>1 this is?</p> <p>2 MS. DEGTYAREVA: I truly don't know,</p> <p>3 which is why we're asking.</p> <p>4 MR. CUTLER: Well, I don't think she</p> <p>5 has any foundation to answer questions</p> <p>6 about this.</p> <p>7 MS. DEGTYAREVA: Whether she was --</p> <p>8 what's the topic?</p> <p>9 MR. CUTLER: I understand that there</p> <p>10 are topics, but if we don't even know what</p> <p>11 the spreadsheet is, I'm not sure how you</p> <p>12 expect her to answer questions on it.</p> <p>13 MS. DEGTYAREVA: That's the point of</p> <p>14 designating a 30(b)(6) witness, so that we</p> <p>15 can find out information.</p> <p>16 MR. CUTLER: You can put any</p> <p>17 spreadsheet in front of them and ask</p> <p>18 questions about it?</p> <p>19 MS. DEGTYAREVA: It's a spreadsheet</p> <p>20 by TUSD that appears to relate to a topic</p> <p>21 that she was designated on. If she</p> <p>22 doesn't know, that's where we are, but</p> <p>23 we're entitled to ask her.</p> <p>24 MR. CUTLER: That's what she said.</p> <p>25 ///</p>	<p style="text-align: right;">Page 128</p> <p>1 provided to students, looks like that's their</p> <p>2 documentation.</p> <p>3 Q. And under the description, do you</p> <p>4 know who is responsible for inputting that</p> <p>5 description?</p> <p>6 MR. CUTLER: Object to form. Lacks</p> <p>7 foundation.</p> <p>8 THE WITNESS: I don't.</p> <p>9 MS. DEGTYAREVA: Can we please mark</p> <p>10 for the record Exhibit 8, which is going</p> <p>11 to be tab 3.</p> <p>12 (Tucson-30(b)(6)-Shivanonda-8 was</p> <p>13 marked for identification.)</p> <p>14 BY MS. DEGTYAREVA:</p> <p>15 Q. Ms. Shivanonda, are you familiar</p> <p>16 with this document?</p> <p>17 (Witness reviewing document.)</p> <p>18 A. Yes.</p> <p>19 Q. This is titled Plaintiff's Third</p> <p>20 Amended Answers to Defendants' Interrogatories</p> <p>21 to Tucson Unified School District (Set 1).</p> <p>22 Then if you turn to page 8, under</p> <p>23 Interrogatory Number 3, do you see where it</p> <p>24 says, "Separately identify and describe</p> <p>25 (including the date, location, nature and</p>
<p style="text-align: right;">Page 127</p> <p>1 BY MS. DEGTYAREVA:</p> <p>2 Q. Well, Ms. Shivanonda, if you look at</p> <p>3 the slipsheet that we gave to you, you'll see</p> <p>4 there's a metadata form, which includes a file</p> <p>5 name that says "2024-2025 WAM Workbook."</p> <p>6 A. Okay.</p> <p>7 Q. Does that title have any meaning to</p> <p>8 you?</p> <p>9 A. It does not, but I do know that if</p> <p>10 it comes from Joseph Gau, director of Health</p> <p>11 Services, I imagine this would be information</p> <p>12 from the Health Services department.</p> <p>13 Q. But, again, you're not aware of</p> <p>14 anything relating to that tab we're looking at?</p> <p>15 A. I am not.</p> <p>16 Q. And then just to confirm, can we go</p> <p>17 back to the spreadsheet and look at the tab</p> <p>18 labeled HLT 603?</p> <p>19 Do you know anything about the</p> <p>20 information that's listed in this tab or where</p> <p>21 it comes from?</p> <p>22 A. I do not. It looks as though this</p> <p>23 would be -- this looks as though -- so our</p> <p>24 health office assistant, this looks as though</p> <p>25 these would be the services that they had</p>	<p style="text-align: right;">Page 129</p> <p>1 extent, and cost of repair or replacement) every</p> <p>2 instance of vandalism, property damage, or</p> <p>3 criminal action you contend occurred as a result</p> <p>4 of Online Media and Communications Services."</p> <p>5 Do you see that?</p> <p>6 A. I do see that.</p> <p>7 Q. Going on to the next page, starting</p> <p>8 on 9, page 9, there's a chart that spans several</p> <p>9 pages and goes until page 14.</p> <p>10 Were you involved in preparing this</p> <p>11 chart?</p> <p>12 A. I was not.</p> <p>13 Q. Do you have personal knowledge of</p> <p>14 any of the incidents that are listed in this</p> <p>15 chart?</p> <p>16 A. I have -- I have some overall</p> <p>17 knowledge, yes. I don't have specific</p> <p>18 knowledge.</p> <p>19 Q. Does TUSD attribute all of these</p> <p>20 instances to social media?</p> <p>21 A. Yes.</p> <p>22 Q. And what is TUSD's basis for</p> <p>23 attributing these incidents to social media?</p> <p>24 A. Time frame, and then reporting</p> <p>25 documents. So connection with any of the</p>

<p style="text-align: right;">Page 130</p> <p>1 Facebook/TikTok challenges that were in that 2 time frame, and then the reports from school 3 personnel to report the reasons behind why they 4 needed these -- fixes needed to be fixed. 5 Q. How did TUSD identify the incidents 6 that were -- that it attributed to social media? 7 A. Again, part of the reporting process 8 to request a facilities or maintenance request, 9 there are specific components in the requests, 10 so school staff will denote a reason behind why 11 they need a particular facility's request to be 12 completed. 13 Q. And where is the data about those 14 requests stored? 15 A. That would be within our facilities 16 and maintenance database. 17 Q. Does that database have a name? 18 A. It eludes me at the moment. 19 Q. And so that database would include a 20 narrative response that explains the reason for 21 the incident? 22 A. Correct, yes. So whenever -- again, 23 when there's a facilities request made, the 24 school or the personnel will denote the date, 25 what was vandalized, where, what needs to be</p>	<p style="text-align: right;">Page 132</p> <p>1 it may or may not be indicated in any of those 2 databases. 3 Q. Now, you mentioned that the time 4 frames listed here correspond to some specific 5 social media challenges. 6 Can you please provide more 7 information about that? 8 MR. CUTLER: Object to form. 9 THE WITNESS: So, again, staying on 10 the pulse of what's happening, so, for 11 example, we know that there was a lot of 12 social media challenges, TikTok challenges 13 within a lot of these time frames where 14 there were videos that were posted that 15 were encouraging students to slap their 16 teacher and take a video of it, of ripping 17 off sinks, ripping off paper towel 18 dispensers, soap dispensers. 19 So there was a lot of challenges 20 that were being posted that many of our 21 students felt the need to emulate and then 22 basically get, you know, likes and 23 accolades for. So a lot of these would 24 correspond to some of those specific 25 challenges that we knew of that were</p>
<p style="text-align: right;">Page 131</p> <p>1 fixed and why. 2 Q. Did TUSD take any steps to verify 3 that these instances of vandalism listed in the 4 charts were, in fact, related to social media 5 platforms? 6 A. I can't speak to every one, but I do 7 know that as part of the investigative process, 8 especially at these higher level, there's 9 generally an investigation around what has 10 particularly happened. 11 And then, as you can see, kind of 12 categories and time frames, they all correspond 13 to specific social media challenges, so 14 backwards mapping, and then having conversations 15 with students and investigating some of the 16 reasons. 17 Like I said, I can't speak to every 18 single, but I do know that many of them were 19 investigated. 20 Q. And are the details or results of 21 those investigations, is that recorded anywhere? 22 A. If a perpetrator, so to speak, was 23 identified, then it would be within the 24 disciplinary database. But if it could not 25 identify a specific person who did the damage,</p>	<p style="text-align: right;">Page 133</p> <p>1 occurring during that time frame. 2 BY MS. DEGTAREVA: 3 Q. So can you explain which of these 4 incidents correspond to which social media 5 challenge? 6 MR. CUTLER: Object to form. 7 THE WITNESS: Again, there's so many 8 dates here and so many. I couldn't speak 9 to specifics without going through and 10 evaluating all of the data that we may 11 have. 12 BY MS. DEGTAREVA: 13 Q. Just sitting here today looking at 14 the chart, are there any that jump out at you as 15 ones you can identify as being associated with a 16 specific challenge? 17 A. A lot of the bathroom -- the 18 bathroom specific ones were definitely. Some of 19 the ceiling tiles and vandalizing, some of those 20 were also, things like steal this, steal that. 21 The sinks. A lot of the bathroom was a big 22 component of those challenges. I know that for 23 sure. 24 Q. So when identifying these incidents, 25 did TUSD include -- so, for example, if there</p>

<p style="text-align: right;">Page 134</p> <p>1 was a social media challenge related to 2 bathrooms at a particular time, did TUSD include 3 every instance of vandalism that happened in a 4 bathroom at that time? 5 A. That, I'm not sure of. I imagine 6 somewhere, if there wasn't a need for a fix, it 7 may or may not have been. It may have all been 8 just looped in to, you know, Henry Elementary 9 bathroom vandalism. 10 So I can't speak to all of the 11 specifics, again, without being able to see all 12 of the particular facility's requests. 13 Q. Do you know if for each of these 14 incidents there would be a record somewhere that 15 specifically ties the incident to a social media 16 challenge? 17 A. Again, I believe I've answered that, 18 but it, again -- it would determine if I were to 19 look at the specific facility request. 20 Q. I think my question is, do you know 21 if, for each of these, the facility request, it 22 specifically stated that it was a result of a 23 social media challenge? 24 A. I do not know if every single one of 25 these would have a social media challenge</p>	<p style="text-align: right;">Page 136</p> <p>1 students to want to engage and get the likes and 2 get the clout, so to speak, from engaging in 3 those instances on social media, yes. 4 Q. And other than the incidents 5 identified in this chart, are you aware of any 6 other property damage that TUSD believes it 7 suffered as a result of social media? 8 A. That would be difficult because I've 9 not memorized all of these. I do know that -- 10 for example, I do know that -- can you repeat 11 the question? I apologize. 12 Q. Sure. 13 Apart from the incidents that are 14 listed in this chart, are you aware of any other 15 property damage that TUSD believes it suffered 16 as a result of social media? 17 A. So at a higher level, again, making 18 kind of that causal link between social media 19 and property damage, what we are seeing is that 20 due to either students being left out on social 21 media or if they're social media posts or -- and 22 then also a lot of -- there's a lot of, like, 23 fight pages where students are videoing other 24 students on campus in a fight, and then what 25 happens then is either the fight breaks out,</p>
<p style="text-align: right;">Page 135</p> <p>1 specifically noted in the facility's request. I 2 have not reviewed every single facility's 3 request. 4 Q. Does TUSD have any basis to believe 5 that defendants promoted or encouraged any of 6 the challenges that you were referencing? 7 A. Can you repeat the question? 8 Q. Sure. 9 Does TUSD have any basis to believe 10 that defendants promoted or encouraged any of 11 the social media challenges that you were just 12 referencing? 13 A. Well, I would say that the inherent 14 nature of the platforms and the creation of the 15 likes and the reposts and whether or not you can 16 go viral and the way that the algorithms work on 17 certain platforms, on what gets viral, what's 18 not, I would gauge to say that yes, that they 19 would have some knowledge and promotion of that 20 just in the way that inherent algorithms work 21 within the platforms. 22 The component of the likes and the 23 love and the repost and the reshapes, that is, I 24 would say, evidence in the way that it's created 25 to continuously create an opportunity for</p>	<p style="text-align: right;">Page 137</p> <p>1 something might get broken. We do know of other 2 people actually getting hurt on school campus 3 and property. We've had teachers that are 4 getting pushed and hurt. 5 I don't know if any of our other 6 information on here, such as we were having 7 desks flipped and things were thrown in 8 classrooms, and we are attributing that to, 9 again, the disruption of the use of social media 10 and the way that it's affecting students being 11 able to regulate their emotions. 12 And so it may not be explicit on 13 here, but we have seen, like I said, tables are 14 being flipped. We've got even elementary 15 students that are flipping chairs, where we have 16 to evacuate students when we've got tables 17 broken, teachers' desks are broken, books are 18 ripped up, things are thrown. 19 And so all of that has a direct 20 causal link to what we're seeing as an increase 21 of anxiety, depression, social isolation, 22 students not being able to problem-solve and 23 being able to regulate themselves as a response 24 to what they're seeing and what they're engaging 25 on on social media.</p>

35 (Pages 134 - 137)

<p style="text-align: right;">Page 138</p> <p>1 So, yes, I would say that there's</p> <p>2 probably quite a bit that is not indicated on</p> <p>3 here, and, again, that would be kind of more of</p> <p>4 our soft data where we may or may not be</p> <p>5 explicitly collecting that data in any sort of</p> <p>6 database.</p> <p>7 Q. So you don't have any data that</p> <p>8 shows that there are any other -- there's any</p> <p>9 other property damage that is directly tied to</p> <p>10 social media?</p> <p>11 MR. CUTLER: Object to form. Asked</p> <p>12 and answered.</p> <p>13 THE WITNESS: Again, causation data,</p> <p>14 right, discipline data, anecdotal data as</p> <p>15 we talk with teachers.</p> <p>16 It's not always reported if</p> <p>17 teachers' personal property is damaged,</p> <p>18 which we know that it is on a regular</p> <p>19 basis in school classrooms.</p> <p>20 We know that there's many instances</p> <p>21 where student personal devices are stolen</p> <p>22 on campus, and then the time that it takes</p> <p>23 for, you know, investigations. I guess</p> <p>24 that's not property damage, so to speak.</p> <p>25 But, yes, there's causation data</p>	<p style="text-align: right;">Page 140</p> <p>1 A. Correct.</p> <p>2 Q. So would that be sort of in the</p> <p>3 narrative section of Synergy that there would be</p> <p>4 a tie to social media?</p> <p>5 A. Correct.</p> <p>6 MS. DEGTYAREVA: I think we've been</p> <p>7 going for close to an hour and a half.</p> <p>8 Would now be a good time for a break?</p> <p>9 MR. CUTLER: Sounds good.</p> <p>10 THE VIDEOGRAPHER: We're going off</p> <p>11 record. The time is 4:59.</p> <p>12 (Whereupon, a recess was taken.)</p> <p>13 THE VIDEOGRAPHER: We're going back</p> <p>14 on record. The time is 5:19.</p> <p>15 MS. DEGTYAREVA: Let's mark as</p> <p>16 Exhibit 9 tab 8.</p> <p>17 (Tucson-30(b)(6)-Shivanonda-9 was</p> <p>18 marked for identification.)</p> <p>19 BY MS. DEGTYAREVA:</p> <p>20 Q. Ms. Shivanonda, do you recognize</p> <p>21 this document?</p> <p>22 A. I do.</p> <p>23 Q. What is it?</p> <p>24 A. This is a TUSD policy.</p> <p>25 Q. And specifically is this the policy</p>
<p style="text-align: right;">Page 139</p> <p>1 that we could glean from some of our</p> <p>2 disciplinary data.</p> <p>3 BY MS. DEGTYAREVA:</p> <p>4 Q. And, Ms. Shivanonda, again, I'm</p> <p>5 talking about property damage.</p> <p>6 Are you aware of any data showing</p> <p>7 that there's any other property damage not</p> <p>8 mentioned here that is directly caused by social</p> <p>9 media?</p> <p>10 MR. CUTLER: Object to form. Asked</p> <p>11 and answered.</p> <p>12 Answer again.</p> <p>13 THE WITNESS: Correct.</p> <p>14 Again, through disciplinary data,</p> <p>15 yes. So it may not have been to the level</p> <p>16 of we're putting in a facilities request,</p> <p>17 but, again, because of fights on campus,</p> <p>18 because of the uproar that happens because</p> <p>19 of the use of social media, we are seeing</p> <p>20 potential other property damage that may</p> <p>21 or may not be included in here, yes.</p> <p>22 BY MS. DEGTYAREVA:</p> <p>23 Q. And the disciplinary data that</p> <p>24 you've been talking about, is that the Synergy</p> <p>25 data?</p>	<p style="text-align: right;">Page 141</p> <p>1 on cellphone usage?</p> <p>2 A. It is.</p> <p>3 Q. Now, TUSD's policy does not ban</p> <p>4 cellphone from campus, right?</p> <p>5 A. Correct.</p> <p>6 Q. It states that cellphones may be</p> <p>7 used on or off campus before or after school,</p> <p>8 correct?</p> <p>9 A. Correct.</p> <p>10 Q. And it states that cellphones may be</p> <p>11 used by high school students during lunch,</p> <p>12 right?</p> <p>13 A. Correct.</p> <p>14 When was this updated? Is there a</p> <p>15 date when it was updated? There may be an</p> <p>16 updated version.</p> <p>17 Q. Do you remember when this policy was</p> <p>18 last updated?</p> <p>19 A. I just reviewed the policy recently.</p> <p>20 So this one says, "Revision: August 25, 2006."</p> <p>21 Q. Has the policy been updated since</p> <p>22 this time?</p> <p>23 A. I believe it may have.</p> <p>24 Q. And under the current policy, are</p> <p>25 cellphones allowed to be used on or off campus</p>

<p style="text-align: right;">Page 142</p> <p>1 before or after school?</p> <p>2 A. Yes.</p> <p>3 Q. And under the current policy, are</p> <p>4 high school students allowed to use cellphones</p> <p>5 during lunch?</p> <p>6 A. Under the current policy, that</p> <p>7 provides authorization for additional -- or for</p> <p>8 administrators to determine any cellphone use</p> <p>9 guidelines on their school campus, so I believe</p> <p>10 the new one removes the "during lunch for high</p> <p>11 school students only."</p> <p>12 Q. Where would a copy of this policy,</p> <p>13 the current policy, be found?</p> <p>14 A. On the TUSD governing board website.</p> <p>15 Q. And under the current policy -- so</p> <p>16 in this version it says cellphones may be used</p> <p>17 by elementary and middle school students during</p> <p>18 lunch periods if an administrator approval had</p> <p>19 been obtained, is that right?</p> <p>20 A. So, yes. So in the new updated</p> <p>21 policy, the guidelines are dependent upon</p> <p>22 administrator discretion.</p> <p>23 Q. And just for the record, this is the</p> <p>24 policy that was produced with the PFS in this</p> <p>25 case, but it's your testimony that this policy</p>	<p style="text-align: right;">Page 144</p> <p>1 website?</p> <p>2 A. Mm-hmm.</p> <p>3 Q. Okay. Why don't we pull that up.</p> <p>4 MS. DEGTAREVA: Can we take a</p> <p>5 minute break so we can find that?</p> <p>6 MR. CUTLER: Sure.</p> <p>7 MS. DEGTAREVA: Let's go off the</p> <p>8 record.</p> <p>9 THE VIDEOGRAPHER: We're going off</p> <p>10 record. The time is 5:23.</p> <p>11 (Discussion off the record.)</p> <p>12 THE VIDEOGRAPHER: We're going back</p> <p>13 on record. The time is 5:25.</p> <p>14 BY MS. DEGTAREVA:</p> <p>15 Q. Okay. Ms. Shivanonda, we were just</p> <p>16 talking about this use of cellphones and other</p> <p>17 electronic signaling devices' policy regulation.</p> <p>18 And just for the record, we have confirmed that</p> <p>19 this is the version that is available currently</p> <p>20 on TUSD's website of the policy regulation.</p> <p>21 So in this policy regulation that is</p> <p>22 currently on TUSD's website, it states that</p> <p>23 cellphones may be used on or off campus before</p> <p>24 or after school, correct?</p> <p>25 A. Correct.</p>
<p style="text-align: right;">Page 143</p> <p>1 is not current?</p> <p>2 MR. CUTLER: I'm going to object to</p> <p>3 the form.</p> <p>4 BY MS. DEGTAREVA:</p> <p>5 Q. So it is your testimony that this</p> <p>6 policy that was produced with the PFS is not</p> <p>7 current?</p> <p>8 MR. CUTLER: This was produced with</p> <p>9 the PFS?</p> <p>10 MS. DEGTAREVA: This was produced</p> <p>11 with the PFS.</p> <p>12 MR. CUTLER: It's marked 159360?</p> <p>13 BY MS. DEGTAREVA:</p> <p>14 Q. So it's your testimony that this</p> <p>15 policy is not current, is that right?</p> <p>16 MR. CUTLER: I'm going to object.</p> <p>17 Misstates the testimony. I think she said</p> <p>18 it might not be current.</p> <p>19 THE WITNESS: From my understanding,</p> <p>20 I believe that there is an updated policy,</p> <p>21 especially if this revision says</p> <p>22 August 25th, 2006.</p> <p>23 BY MS. DEGTAREVA:</p> <p>24 Q. You know what, why don't we pull up</p> <p>25 the -- you said it was on the governing board</p>	<p style="text-align: right;">Page 145</p> <p>1 Q. And, again, this policy regulation</p> <p>2 states that cellphones may be used during lunch</p> <p>3 for high school students only?</p> <p>4 A. That is what this says, yes.</p> <p>5 Q. This policy regulation states that</p> <p>6 cellphones may be used by elementary and middle</p> <p>7 school students during lunch periods if they</p> <p>8 have administrative approval, correct?</p> <p>9 A. Correct.</p> <p>10 Q. It also says that cellphones may be</p> <p>11 used on field trips or excursions at -- excuse</p> <p>12 me, if they are allowed. Excuse me. Strike</p> <p>13 that.</p> <p>14 It says may be used for educational</p> <p>15 activities if a teacher approves, correct?</p> <p>16 A. Correct.</p> <p>17 Q. And it says that if a teacher or</p> <p>18 coach approves, it may be used during -- they</p> <p>19 may be used during extended trips and sporting</p> <p>20 events, correct?</p> <p>21 A. Correct.</p> <p>22 MS. DEGTAREVA: Let's mark tab 11</p> <p>23 as Exhibit 10.</p> <p>24 (Tucson-30(b)(6)-Shivanonda-10 was</p> <p>25 marked for identification.)</p>

37 (Pages 142 - 145)

<p style="text-align: right;">Page 146</p> <p>1 BY MS. DEGTYAREVA:</p> <p>2 Q. Ms. Shivanonda, I'll represent to</p> <p>3 you that this is a printout from a website of a</p> <p>4 company called Yondr.</p> <p>5 Do you know what Yondr is?</p> <p>6 A. I do.</p> <p>7 Q. What is it?</p> <p>8 A. It is a company that creates pouches</p> <p>9 that can be locked for students to put</p> <p>10 cellphones in so they don't have access to them.</p> <p>11 Q. And so if a student puts their phone</p> <p>12 into a Yondr pouch, the student then isn't able</p> <p>13 to use the phone, correct?</p> <p>14 A. Correct.</p> <p>15 Q. And the student can keep the locked</p> <p>16 pouch with them, they just can't access the</p> <p>17 phone, right?</p> <p>18 A. Correct.</p> <p>19 Q. Now, Yondr services are available to</p> <p>20 school districts, is that right?</p> <p>21 A. At a cost.</p> <p>22 Q. And TUSD has actually used Yondr</p> <p>23 services before, right?</p> <p>24 A. Yes. It was used at one high</p> <p>25 school.</p>	<p style="text-align: right;">Page 148</p> <p>1 BY MS. DEGTYAREVA:</p> <p>2 Q. Ms. Shivanonda, do you see that this</p> <p>3 is an e-mail chain titled Yondr for Tucson High</p> <p>4 Magnet School?</p> <p>5 Do you see that?</p> <p>6 MR. CUTLER: Take your time to</p> <p>7 review the whole document.</p> <p>8 (Witness reviewing document.)</p> <p>9 BY MS. DEGTYAREVA:</p> <p>10 Q. Let me know when you're ready.</p> <p>11 (Witness reviewing document.)</p> <p>12 A. Okay.</p> <p>13 Q. This is an e-mail chain with a</p> <p>14 subject line Yondr for Tucson High Magnet</p> <p>15 School, right?</p> <p>16 A. Yes.</p> <p>17 Q. Tucson High Magnet School, is that</p> <p>18 the same Tucson High that we were just talking</p> <p>19 about?</p> <p>20 A. Yes.</p> <p>21 Q. And if you look on the e-mail that</p> <p>22 starts at the bottom of page 1 from Shawna</p> <p>23 Rodriguez, June 12, 2019.</p> <p>24 Who is Shawna Rodriguez?</p> <p>25 A. At that time she was the current</p>
<p style="text-align: right;">Page 147</p> <p>1 Q. Which high school was that?</p> <p>2 A. Tucson High.</p> <p>3 Q. And it was used at Tucson High for</p> <p>4 just one school year, right?</p> <p>5 A. Correct.</p> <p>6 Q. That was the 2019 through 2020</p> <p>7 school year?</p> <p>8 A. Correct.</p> <p>9 Q. And in that one school for the year</p> <p>10 it was used, TUSD only used the Yondr pouches</p> <p>11 for math and English language arts classes,</p> <p>12 right?</p> <p>13 A. Correct.</p> <p>14 Q. Now, have there been any other times</p> <p>15 TUSD has used Yondr on any of its campuses?</p> <p>16 A. Not that I'm aware of at the</p> <p>17 district level we supported Yondr. Schools also</p> <p>18 have the autonomy for identifying maybe other</p> <p>19 resources, but I'm not aware of other schools</p> <p>20 explicitly using Yondr.</p> <p>21 MS. DEGTYAREVA: Let's go and mark</p> <p>22 Exhibit 11. Let's mark tab 14 as</p> <p>23 Exhibit 11.</p> <p>24 (Tucson-30(b)(6)-Shivanonda-11 was</p> <p>25 marked for identification.)</p>	<p style="text-align: right;">Page 149</p> <p>1 principal of Tucson High.</p> <p>2 Q. And going to the next page which</p> <p>3 ends in Bates numbers 609, you'll see it says,</p> <p>4 "Here is our plan:"</p> <p>5 And then the first bullet is a</p> <p>6 "Needs Assessment:"</p> <p>7 Do you see that?</p> <p>8 A. Mm-hmm.</p> <p>9 Q. So this "Needs Assessment" listed</p> <p>10 some of the reasons that Tucson High Magnet</p> <p>11 School wanted to try Yondr pouches, right?</p> <p>12 A. That's what it looks like, mm-hmm.</p> <p>13 Q. And some of the things listed here</p> <p>14 include, "Truancy or extensive time away from</p> <p>15 class due to cell phone use of meeting up with</p> <p>16 friends or ordering food through Uber Eats, Grub</p> <p>17 Hub etc."</p> <p>18 Right?</p> <p>19 A. Mm-hmm.</p> <p>20 Q. Also this "Coordinate of fights,</p> <p>21 drug transactions, meeting up with</p> <p>22 girlfriend/boyfriends that can lead to</p> <p>23 inappropriate behavior."</p> <p>24 Right?</p> <p>25 A. Mm-hmm.</p>

<p style="text-align: right;">Page 150</p> <p>1 Q. "Invitation to classes where there 2 is a substitute teacher having students who are 3 not on the roster to 'hangout' in the class 4 since the sub is unfamiliar with the class; this 5 has also led to in-class fights." 6 Do you see that? 7 A. Mm-hmm. 8 Q. So all of these are issues that 9 could involve cellphones, right? 10 A. Yes. 11 Q. But some of these actually expressly 12 call out other apps like Uber Eats and Grubhub 13 that are not social media, right? 14 A. Yes. 15 Q. And other things listed here like 16 meeting up with a girlfriend or boyfriend are 17 things that can be done via social media, via 18 text message, correct? 19 MR. CUTLER: Object to form. 20 THE WITNESS: Correct, I imagine. 21 BY MS. DEGTAREVA: 22 Q. Does TUSD have data showing what 23 percentage of these types of communications were 24 made via text message as opposed to social media 25 apps?</p>	<p style="text-align: right;">Page 152</p> <p>1 BY MS. DEGTAREVA: 2 Q. And the conversations with students, 3 are those recorded in any data source? 4 A. Again, not necessarily. So it's 5 difficult -- a lot of the work that we do again 6 is in conversation and anecdotal data. I can't 7 speak to what Shawna did in this time, but we 8 often will just talk with students and identify, 9 like, how are you using your cellphones to try 10 to get a better handle on it. 11 So that could be considered data, 12 yes. 13 Q. Now, this -- the Needs Assessment in 14 this e-mail, in this Needs Assessment, Shawna 15 Rodriguez never used the words "social media," 16 right? 17 A. Correct. 18 Q. She never mentioned any of 19 defendants' platforms by name in this Needs 20 Assessment, right? 21 A. Correct. 22 Q. And she did mention some other apps 23 by names here, correct? 24 A. Correct. 25 MS. DEGTAREVA: Now let's mark as</p>
<p style="text-align: right;">Page 151</p> <p>1 MR. CUTLER: Object to form. 2 THE WITNESS: So when we think about 3 data -- we've talked about soft data, 4 right? So in our discipline data, we can 5 see a trend of the majority of students 6 are utilizing social media apps for their 7 connection. 8 When we have had opportunities to 9 talk with students, the majority of 10 students do report that they don't 11 generally use SMS text, they text via 12 Instagram or via Facebook. 13 So it doesn't explicitly call that 14 out here, but from our anecdotal data and 15 then our discipline data, it does -- there 16 is an evidence of social media use to -- 17 that's generally the most used method for 18 texting. 19 BY MS. DEGTAREVA: 20 Q. And again this discipline data that 21 you're relying on for this is the Synergy data, 22 the narrative sections of the Synergy data? 23 MR. CUTLER: Object to form. 24 THE WITNESS: Correct. That's part 25 of it, yes.</p>	<p style="text-align: right;">Page 153</p> <p>1 Exhibit 12 tab 13. 2 (Tucson-30(b)(6)-Shivanonda-12 was 3 marked for identification.) 4 BY MS. DEGTAREVA: 5 Q. Ms. Shivanonda, do you see at the 6 top here it says Cell Phone Feedback for Quarter 7 1 - 110 Teachers Total Separated By Department 8 and YONDR and Non-YONDR? 9 Do you see that? 10 A. I do. 11 Can I take a second to review this 12 document. 13 Q. Sure. Yeah. Let me know when 14 you're ready. 15 (Witness reviewing document.) 16 A. Okay. 17 Q. So these are survey results from the 18 first quarter that Tucson High Magnet School was 19 using Yondr, correct? 20 MR. CUTLER: Objection. Lacks 21 foundation. 22 THE WITNESS: It looks as though. 23 BY MS. DEGTAREVA: 24 Q. And 110 teachers were surveyed? 25 A. That is what it says.</p>

<p style="text-align: right;">Page 154</p> <p>1 Q. Now, this survey appears to be 2 broken down by teachers in different subjects, 3 ELA (19), Math (22), Fine Arts (13), and so on, 4 right? 5 A. Yes. 6 Q. And only the math and ELA classes 7 are the ones that used Yondr, correct? 8 A. That is my understanding, yes. 9 Q. And just if you could quickly go 10 back to the prior exhibit which was the e-mail 11 from Shawna Rodriguez, at the bottom of page -- 12 of the first page, Ms. Rodriguez says, "I am 13 really eager to implement our cell phone policy 14 this year." 15 Do you see that? 16 A. Yes. 17 Q. So taking you back to exhibit -- 18 sorry, exhibit we were just looking at of the 19 survey results -- 20 MR. CUTLER: 12. 21 BY MS. DEGTYAREVA: 22 Q. -- Exhibit 12. 23 So this survey includes teachers' 24 responses to the new cellphone policy from 25 classrooms that use Yondr and then from</p>	<p style="text-align: right;">Page 156</p> <p>1 BY MS. DEGTYAREVA: 2 Q. And just to look at a couple of 3 these quotes on page -- the page ending in Bates 4 931, at the bottom of the page one of the 5 teachers says, "Works for me! It's easy if you 6 enforce it and use it consistently." 7 Do you see that? 8 A. I do see that, mm-hmm. 9 Q. And go to the next page, 932. This 10 is from the math class. One of the teachers 11 says, "Strong consistent consequences are 12 working." 13 Do you see that? 14 A. I do. 15 Q. Another one says, "Night and Day 16 from last year; keep up Admin support." 17 Do you see that? 18 A. I do. 19 Q. Another one says, "Kids are more 20 focused and do more work." 21 Do you see that? 22 A. Yes. 23 Q. And one says, "Last year it was 24 every day; this year so far I've only had to 25 talk with one student so far."</p>
<p style="text-align: right;">Page 155</p> <p>1 non-Yondr classrooms as well, correct? 2 MR. CUTLER: Object to form. 3 Foundation. 4 THE WITNESS: That is what this 5 looks like, yes. 6 BY MS. DEGTYAREVA: 7 Q. And based on the results of this 8 survey, a lot of the teachers found the new 9 cellphone policy to be effective, right? 10 MR. CUTLER: Foundation. 11 THE WITNESS: Based on this, it 12 appears the numbers are higher for 13 effective than ineffective. 14 BY MS. DEGTYAREVA: 15 Q. So teachers in the math and ELA 16 classes who were using Yondr, there's some 17 comments here showing that they found the policy 18 to be effective at reducing cellphone use, 19 correct? 20 MR. CUTLER: Object to form. 21 Foundation. 22 THE WITNESS: Based on my review of 23 these, yes, it does seem like there's 24 positive responses. 25 ///</p>	<p style="text-align: right;">Page 157</p> <p>1 Do you see that? 2 A. I do. 3 Q. And then the teachers in the other 4 classrooms who were not using Yondr also found 5 the new cellphone policy was -- or for the most 6 part also found that the new cellphone policy 7 was effective based on these survey results, 8 right? 9 MR. CUTLER: Objection. Form, 10 foundation. 11 THE WITNESS: As the document, yes, 12 it does appear to say that. 13 BY MS. DEGTYAREVA: 14 Q. And in the teacher responses some of 15 them talk about other methods, such as having a 16 student leave their cellphone in a backpack 17 against the wall as also being effective, right? 18 A. Which page does that say that? 19 Q. Sure. So let's take a look at a 20 couple of examples. 21 So on the page ending in 933, under 22 Fine Arts, one of the teachers says, "Bags 23 against wall problem solved." 24 Do you see that? 25 A. Yes.</p>

40 (Pages 154 - 157)

<p style="text-align: right;">Page 158</p> <p>1 Q. And again in this non-Yondr 2 classroom, another teacher says, "The 3 consistency school-wide means less arguments in 4 my room." 5 Do you see that? 6 MR. CUTLER: Objection to form. 7 Foundation. 8 THE WITNESS: Yes, I do see that. 9 BY MS. DEGTAREVA: 10 Q. Another comment, "I have less 11 cellphone use overall." 12 Do you see that? 13 A. I do. 14 Q. And the last one on this page, "I 15 have had zero pushback because the school wide 16 policy makes kids believe we are serious." 17 Do you see that? 18 A. I see that, yes. 19 Q. And going on to the next page ending 20 in 934, in World Languages and ELD, a teacher 21 says, "Phones in backpacks, backpacks stowed 22 away. Halleluia." 23 Do you see that? 24 A. I see that. 25 Q. Now, several of the teachers</p>	<p style="text-align: right;">Page 160</p> <p>1 Q. But TUSD never implemented Yondr 2 districtwide, correct? 3 A. Correct. 4 Q. And apart from, again, this one 5 school in one year and just two class subjects, 6 it never implemented Yondr in any other schools? 7 A. That is my understanding, correct. 8 Q. Has TUSD ever implemented a 9 districtwide policy requiring what some of these 10 teachers refer to as the backpack policy, so 11 requiring students to put their phones in their 12 backpacks during class? 13 A. As part of the current TUSD 14 cellphone policy, it does require at least the 15 verbiage -- the one that I found online that I 16 said is a little bit different than the one we 17 looked at, it does say that cellphones are to be 18 stored in backpacks or in lockers or out of 19 sight and not being used. So we do currently 20 have that policy. And then administrators at 21 school campuses then can adjust their own 22 policies based on their campus needs. 23 MS. DEGTAREVA: Can we mark as 24 Exhibit 13 tab 9? 25 ///</p>
<p style="text-align: right;">Page 159</p> <p>1 surveyed also noted they have always had a 2 strict enforcement policy in their individual 3 classrooms and didn't have a problem with phones 4 even before Yondr. 5 Do you see that? 6 A. Yes. I've seen a few of those, yes. 7 Q. So looking at a couple of examples 8 in the Bates ending in 935, at the very top one 9 teacher said, "I've always maintained a strict 10 enforcement of no cellphones in my classroom." 11 Do you see that? 12 A. I do. 13 Q. And at the bottom of that same page, 14 at the very bottom a teacher said, "I have had a 15 strict policy for years. I run my classroom 16 without interference from cellphones." 17 Do you see that? 18 A. I do see that. 19 Q. Did TUSD consider implementing Yondr 20 in other schools? 21 A. I am not aware. What I -- I am not 22 aware, correct. 23 Q. Well, did TUSD ever estimate the 24 cost of implementing Yondr in other schools? 25 A. I am not aware.</p>	<p style="text-align: right;">Page 161</p> <p>1 (Tucson-30(b)(6)-Shivanonda-13 was 2 marked for identification.) 3 BY MS. DEGTAREVA: 4 Q. Ms. Shivanonda, this is a document 5 titled Governing Board Policy, Policy Title, 6 Student Use of Cellphones and Other Electronic 7 Devices. 8 Do you see that? 9 A. Yes, correct. 10 Q. Is this the document you were 11 testifying about as the other cellphone policy? 12 A. Yes, it is. 13 Q. And this document says, near the 14 middle of the page, "Cellphone and/or electronic 15 devices are to be kept out of view in a 16 student's locker, pocket, or carrying bag." 17 Do you see that? 18 A. Correct, yes. 19 Q. So under this policy students can 20 keep their cellphones in their pockets? 21 A. Correct. 22 Q. TUSD has never implemented a 23 districtwide policy that required students to 24 put their phones in their backpacks, correct? 25 MR. CUTLER: Object to form.</p>

41 (Pages 158 - 161)

<p style="text-align: right;">Page 162</p> <p>1 THE WITNESS: Correct. However, 2 also part of this policy, the principal 3 shall establish additional guidelines 4 appropriate to campus needs, and so many 5 of our schools have integrated more 6 stricter cellphone policies to where they 7 either need to be turned in at the office 8 or put away in their backpacks. 9 BY MS. DEGTYAREVA: 10 Q. How many schools have implemented 11 those stricter policies? 12 A. I'm not aware of the number. I do 13 know it's up to the school administration to 14 identify how they want to implement those 15 policies outside of this one. 16 Q. Can you name some of the schools 17 that have a stricter cellphone policy? 18 A. Yes. So Sabino High School, 19 actually they purchased cellphone lockers this 20 past school year. And so every one of their 21 classrooms has a set of 40 lockers with keys, 22 and they adjusted their cellphone policy where 23 it is a requirement for all students to put 24 cellphones in a cellphone locker in every class 25 period.</p>	<p style="text-align: right;">Page 164</p> <p>1 policy. 2 Q. Some of the things you mentioned 3 that have been adopted by a couple of the 4 schools, cellphone lockers, is there any other 5 school except Sabino High School that uses 6 cellphone lockers? 7 A. Not currently, but I do know that 8 they have been conversation for additional high 9 schools to look at implementing in the new 10 school year. 11 Q. And has the district ever 12 implemented a districtwide policy that requires 13 the use of cellphone lockers? 14 A. No. 15 Q. You also talked about an elementary 16 school that requires students to turn in their 17 cellphones to the front office. 18 Is there any other school that 19 requires students to turn their cellphones in to 20 the front office? 21 A. As part of -- I don't know 22 explicitly off the top of my head, but I do know 23 that it's part of the disciplinary process. 24 Part of that would be if the student has their 25 cellphone out or is violating the policy, it can</p>
<p style="text-align: right;">Page 163</p> <p>1 I do know that Steele Elementary, 2 for the elementary students, if students do have 3 a cellphone, they are asked to turn it in to the 4 front office. 5 I know that Wakefield Middle School 6 has also instituted stricter cellphone policies. 7 Morgan Maxwell instituted stricter 8 cellphone policies as well as clear backpack 9 policies to then also be able to see that 10 cellphones were in backpacks versus on the 11 person. 12 And those are just a few that I can 13 think of off the top of my head. 14 Q. And where are those school-specific 15 policies, where are they recorded? 16 A. In the school-specific handbook and 17 guidelines for the operation of that school. 18 Q. So each school has a handbook that 19 contains a cellphone policy, or do not all 20 schools have the specific cellphone policy? 21 A. So every school should have a 22 handbook that at least has the governing board's 23 cellphone policy. And if they have any 24 additional requirements regarding cellphones, 25 then that would be indicated in their cellphone</p>	<p style="text-align: right;">Page 165</p> <p>1 be confiscated, and after a certain number of 2 instances it will either be turned in to the 3 office or kept until a parent can come pick it 4 up. 5 There are, maybe, some specific 6 individual students that have an intervention 7 plan that requires them not to have a cellphone, 8 but, again, that would be determinant upon 9 school discipline data and in partnership with 10 administration. 11 Q. So apart from Steele Elementary 12 School, is there any other school in Tucson 13 Unified School District that requires every 14 student just as a matter of course to turn their 15 cellphone in to the front office? 16 MR. CUTLER: Object to form. 17 THE WITNESS: Not that I am aware of 18 to that level. 19 BY MS. DEGTYAREVA: 20 Q. You talked about Wakefield Middle 21 School also having a stricter cellphone policy. 22 What did that policy require? 23 A. So that is, again, having 24 students -- requiring students to have 25 cellphones in backpacks and more of the</p>

<p style="text-align: right;">Page 166</p> <p>1 implementation of the expectations around the 2 discipline. So they have enacted stricter 3 cellphone policies in terms of seeing it out and 4 monitoring that students have it out during 5 instructional practice times. 6 Q. Apart from Wakefield Middle School, 7 are you aware of any other school in the 8 district that has a schoolwide policy requiring 9 students to put their phones in backpacks? 10 A. I'm not thinking of specific names 11 on the top of my head, but I do know that the 12 majority of our schools do look at the cellphone 13 policy and do implement in ways appropriate to 14 their campus. 15 Q. So, again, just going back to my 16 question, you are not aware of any other school 17 except for Wakefield Middle School that requires 18 students to put their cellphones in backpacks? 19 MR. CUTLER: Object to form. 20 BY MS. DEGTYAREVA: 21 Q. Is that right? 22 A. Not off the top of my head, correct. 23 Q. Then you said Morgan Maxwell has 24 also instituted stricter cellphone policies as 25 well as clear backpack policies?</p>	<p style="text-align: right;">Page 168</p> <p>1 schools, they do enhance their cellphone policy. 2 I just am not recalling specifics off the top of 3 my head right now. 4 Q. Are you aware of the ways in which 5 the other schools enhance the cellphone policy? 6 A. I believe it's more in the 7 implementation of the discipline. One of the 8 difficulties lies in there's a lot of barriers 9 and pushback from community and from parents, 10 which can make it very difficult for 11 implementation of specific cellphone policies. 12 And so I know that majority of the 13 schools do attempt to follow this policy and 14 then establish additional guidelines. I do not 15 know at what extent every school -- we have 16 almost 90 schools in the district, so I do not 17 know to what extent all of the schools have 18 added additional guidelines. 19 Q. I want to ask a couple more 20 questions about Sabino High School and their 21 locker policy. 22 What was the cost of implementing 23 cellphone lockers at Sabino High School? 24 A. \$14,000. 25 Q. How big is that high school?</p>
<p style="text-align: right;">Page 167</p> <p>1 A. Correct. 2 Q. So apart from the clear backpack 3 policy, is there anything else about Morgan 4 Maxwell's cellphone policy that is different 5 from the districtwide policy? 6 A. Again, it requires the cellphone to 7 be in the backpack. 8 Q. Are you aware of any other school 9 apart from Morgan Maxwell that has instituted a 10 schoolwide clear backpack policy? 11 A. I know that I had a discussion with 12 the principal of Morgan Maxwell, and she did 13 indicate. I believe there were one or two other 14 middle schools, but I am not recalling the name 15 of the middle schools off the top of my head 16 right now. 17 Q. Okay. So we've talked about Sabino 18 High School, Steele Elementary School, Wakefield 19 Middle School, Morgan Maxwell, and perhaps one 20 or two other schools that have also instituted a 21 clear backpack policy. 22 Any other schools you can think of 23 sitting here today that have a stricter 24 cellphone policy? 25 A. Again, I know the majority of our</p>	<p style="text-align: right;">Page 169</p> <p>1 A. I want to say almost 800, 800 2 students. 3 Q. Has TUSD ever analyzed how much it 4 would cost to implement a cellphone locker 5 policy at every school in the district? 6 A. Not that I'm aware of with cost. 7 Q. And at Sabino High School, are 8 students still allowed to access their 9 cellphones during conference periods, passing 10 periods, and lunch? 11 A. They are required to put their 12 cellphone in every core and elective class. So 13 if they're not in a classroom, then they do have 14 access to their cellphone. 15 Q. Apart from the two policy documents 16 that we looked at, the two districtwide policy 17 documents, has TUSD implemented any other 18 districtwide policies regarding cellphone use? 19 A. So the governing board has had 20 discussions around implementing more stringent 21 cellphone policies. There comes a lot of 22 pushback and barriers within the community. We 23 do hear from a lot of parents that do not -- 24 they have fear of their students not being able 25 to access their cellphones in emergent</p>

<p style="text-align: right;">Page 170</p> <p>1 situations.</p> <p>2 Our governing board has requested</p> <p>3 more additional information. They're also not</p> <p>4 sure of how they're being used, as part of this</p> <p>5 policy also says that teachers can potentially</p> <p>6 have cellphones used for instructional purposes.</p> <p>7 So they have had discussions around</p> <p>8 stricter cellphone policies, but have not</p> <p>9 enacted anything specific outside of the current</p> <p>10 policy as it stands.</p> <p>11 Q. Okay. So the two policy documents</p> <p>12 we looked at are the only two districtwide</p> <p>13 policy documents on cellphones, correct?</p> <p>14 MR. CUTLER: Object to form.</p> <p>15 THE WITNESS: Correct.</p> <p>16 BY MS. DEGTAREVA:</p> <p>17 Q. I believe you testified earlier that</p> <p>18 TUSD also has WIFI on its school campuses, is</p> <p>19 that right?</p> <p>20 A. That is correct.</p> <p>21 Q. Are students able to use their</p> <p>22 personal devices to access the WIFI on the</p> <p>23 school campuses?</p> <p>24 MR. CUTLER: Objection. Asked and</p> <p>25 answered.</p>	<p style="text-align: right;">Page 172</p> <p>1 TUSD's campuses?</p> <p>2 A. Yes.</p> <p>3 MS. DEGTAREVA: Let's mark as</p> <p>4 Exhibit 14 tab 16.</p> <p>5 (Tucson-30(b)(6)-Shivanonda-14 was</p> <p>6 marked for identification.)</p> <p>7 BY MS. DEGTAREVA:</p> <p>8 Q. Let me know when you're ready.</p> <p>9 (Witness reviewing document.)</p> <p>10 A. Okay.</p> <p>11 Q. Looking at the first page, it says</p> <p>12 Pueblo Gardens PK through 8.</p> <p>13 A. Yes.</p> <p>14 Q. What does that refer to?</p> <p>15 A. That is one of our TUSD schools.</p> <p>16 Q. And this is a presentation welcoming</p> <p>17 back families to the school for the 2021-2022</p> <p>18 school year?</p> <p>19 A. That is what it looks like.</p> <p>20 Q. Turning to the page ending Bates</p> <p>21 723, do you see where it says at the top "Please</p> <p>22 join us on Facebook"?</p> <p>23 A. Yes.</p> <p>24 Q. So this school is inviting parents</p> <p>25 or inviting families to join -- or to follow</p>
<p style="text-align: right;">Page 171</p> <p>1 THE WITNESS: No, students are not.</p> <p>2 The policy is that students are not able</p> <p>3 to use district WIFI on their personal</p> <p>4 devices.</p> <p>5 BY MS. DEGTAREVA:</p> <p>6 Q. Are there any restrictions that</p> <p>7 prevent students from accessing the WIFI on</p> <p>8 their personal devices?</p> <p>9 A. The district does take precautions</p> <p>10 and it is not widely known, the knowledge of the</p> <p>11 WIFI password, and even for staff. Majority of</p> <p>12 staff, we are not able to use our own personal</p> <p>13 devices and get connected to WIFI. So all of</p> <p>14 the WIFI connections do run through our</p> <p>15 technology department.</p> <p>16 Students can be savvy and sometimes</p> <p>17 they may be able to find ways, but for the</p> <p>18 majority of the practices, students should not</p> <p>19 be able to access district-level WIFI on their</p> <p>20 personal devices.</p> <p>21 Q. But TUSD does provide students with</p> <p>22 school-issued devices, right?</p> <p>23 A. Correct.</p> <p>24 Q. And are students able to use the</p> <p>25 school-issued devices to access the WIFI on</p>	<p style="text-align: right;">Page 173</p> <p>1 them on Facebook, correct?</p> <p>2 A. That is what it looks like, yes.</p> <p>3 Q. And then if you go to page ending in</p> <p>4 725 titled Verizon Innovative Learning Schools,</p> <p>5 do you see that?</p> <p>6 A. Mm-hmm.</p> <p>7 Q. What is an innovative learning</p> <p>8 school?</p> <p>9 A. TUSD has received some grant funding</p> <p>10 and has collaborated with Verizon to create</p> <p>11 innovative learning schools. So we have -- I</p> <p>12 don't remember off the top of my head how many</p> <p>13 Verizon innovative learning schools. I want to</p> <p>14 say maybe around ten. But it is a partnership</p> <p>15 with Verizon to provide additional access to</p> <p>16 instructional tools.</p> <p>17 Q. This presentation says that iPads</p> <p>18 are issued for all students grades 6 through 8</p> <p>19 with limited data plan but unlimited WIFI.</p> <p>20 Are iPads issued to all students</p> <p>21 grades 6 through 8 across all of TUSD?</p> <p>22 A. No.</p> <p>23 Q. So which students get TUSD -- which</p> <p>24 students get iPads districtwide?</p> <p>25 A. iPads are used in a variety of ways</p>

<p style="text-align: right;">Page 174</p> <p>1 at some of our elementary schools. At our 2 younger grades, kinder, first grade, they may 3 have iPads to use for instructional purposes. 4 And then our Verizon Innovative Learning Schools 5 use the iPads in lieu of a district-issued 6 Chromebook or laptop. 7 Q. So this presentation for this 8 particular school, it then says at the bottom of 9 this page, "Grade K through 5 students will be 10 loaned Chromebooks." 11 A. Correct. 12 Q. So do all students across TUSD get 13 Chromebooks? 14 A. We are a one-to-one school. So yes, 15 depending upon if there's iPad or laptop, 16 students do -- are loaned a device. 17 Q. Okay. So just to make sure I 18 understand, every student across the district 19 gets some device, and it's either a Chromebook 20 or an iPad? 21 A. Correct. 22 Q. And are all of those devices able to 23 connect -- all those school-issued devices able 24 to connect to the unlimited WIFI offered by 25 TUSD?</p>	<p style="text-align: right;">Page 176</p> <p>1 A. Yes. 2 Q. And what are those limits? 3 A. So the district does engage in 4 filtering practices for all WIFI, for both staff 5 and students. And so all social media platforms 6 are not allowed to be used by students on TUSD 7 WIFI. 8 And then keyword, there are specific 9 keywords within that filtering that would block 10 specific content based on keywords that have 11 been determined by our technology department. 12 Q. You said all social media platforms 13 are not allowed to be used by students on TUSD 14 WIFI. 15 Which specific social media 16 platforms are not permitted on the WIFI? 17 A. Facebook, Instagram, TikTok, X. The 18 other platform names are escaping me. Snapchat. 19 Facebook, Instagram, TikTok, Snapchat, X, 20 Discord. Those are the main ones that are 21 coming to mind. 22 Q. Are there any other websites that 23 students can't access on the TUSD WIFI? 24 A. Again, it's based on content, so 25 content filtering.</p>
<p style="text-align: right;">Page 175</p> <p>1 A. Those devices are able to connect 2 TUSD WIFI when they are on TUSD campus. 3 I don't know about the terminology 4 of "unlimited WIFI." For majority of our 5 students the district does not provide WIFI in 6 their home, especially not with the Chromebooks. 7 So I can't necessarily speak to what that word 8 "unlimited" necessarily means for the iPads. 9 Q. So the WIFI is available on all of 10 the devices while they are at school? 11 A. Correct. 12 Q. Does TUSD limit what apps can be 13 downloaded on the iPads or the Chromebooks? 14 A. Yes. 15 Q. And what are the limitations? 16 A. So for downloading of apps, they all 17 come prestandard. So students are not able to 18 download any specific apps of their choosing. 19 So the Chromebooks are -- the district has 20 identified the appropriate learning apps that 21 are able to be used, and then those are 22 preloaded onto those Chromebooks. 23 Q. Does TUSD place any limits on what 24 websites can be accessed on the iPads or the 25 Chromebooks that are issued by TUSD?</p>	<p style="text-align: right;">Page 177</p> <p>1 Q. Just make sure I understand, for the 2 social media platforms you just mentioned, are 3 those based on content filtering, or are those 4 just completely prohibited? 5 A. Those are just prohibited. 6 Q. So are there any other websites that 7 are completely prohibited and not based on 8 content filtering? 9 A. Any websites that would have to do 10 with pornography, any other websites that would 11 be explicit content that would be not 12 appropriate for students. 13 Q. Any other specific websites you can 14 think of? 15 A. I'm trying to think, because there's 16 been some websites that even -- oh, so things 17 like Netflix, Hulu, streaming services are also 18 blocked. Students are able to access -- I'm 19 sorry. It's 6:11 on Tuesday. So I'm having a 20 hard time coming up with every website. 21 Q. Is there a document somewhere that 22 lists all of the websites that are not allowed 23 on the TUSD WIFI? 24 MR. CUTLER: Object to form. 25 THE WITNESS: That would most likely</p>

<p style="text-align: right;">Page 178</p> <p>1 be probably internal with our technology 2 department as they are the ones who manage 3 that. I can't think of maybe any public 4 documents that would list every single 5 website. 6 BY MS. DEGTAREVA: 7 Q. And how long have the website 8 limitations been in place? 9 A. The limitations have been in place 10 pretty -- well, when we started really moving 11 towards one-on-one was when we were coming back, 12 2020 -- well, in 2020 we did provide devices for 13 students for at-home use. 14 Prior to that there were access to 15 technology within classrooms. Some of our 16 schools would have what we would call a COW, 17 computer on wheels, with a whole cartful of 18 computers to be able to use for instructional 19 practices, and so content filtering was in place 20 then. 21 So as long as I can really remember, 22 as long as we've been providing access to 23 technology for students on campuses, there has 24 been some sort of filtering, but I can't speak 25 to the exact specifics.</p>	<p style="text-align: right;">Page 180</p> <p>1 parents use parental controls on school-issued 2 devices? 3 A. I do not believe that that is data 4 that is collected, no. 5 Q. Now, TUSD itself uses social media 6 to communicate with its students and their 7 families, correct? 8 A. Correct. 9 MS. DEGTAREVA: Let's mark as 10 Exhibit 15 tab 18. 11 (Tucson-30(b)(6)-Shivanonda-15 was 12 marked for identification.) 13 BY MS. DEGTAREVA: 14 Q. Ms. Shivanonda, this is a printout 15 of TUSD's website. Does this look familiar to 16 you? 17 A. It does. 18 Q. And if you go to the third page of 19 this exhibit, at the very bottom do you see a 20 row of icons? 21 A. I do. 22 Q. So the first icon there is a link to 23 TUSD's Facebook page, right? 24 A. Correct. 25 Q. And then the third icon is a link to</p>
<p style="text-align: right;">Page 179</p> <p>1 Q. And have defendants' platforms 2 always been included on the list of websites 3 that are not permitted? 4 A. To my knowledge, I believe so. 5 Q. Now, are students able to use their 6 school-issued iPads or Chromebooks to access 7 their home WIFI? 8 A. Yes. If they have WIFI at their 9 home, it is enabled to be able to access WIFI. 10 Q. And so if a student is using their 11 school-issued devices on their home WIFI, are 12 there any restrictions on what websites they can 13 visit? 14 A. TUSD, we are only able to filter on 15 TUSD WIFI, so we do not have the ability to do 16 any filtering on the home WIFI, so no. 17 Q. Does TUSD give parents the ability 18 to use parental controls on the school-issued 19 devices? 20 A. I believe so, but I am not 21 100 percent sure on all the details of that. 22 Q. Do you know what parental controls 23 are available on school-issued devices? 24 A. I do not. 25 Q. Does TUSD have data on how many</p>	<p style="text-align: right;">Page 181</p> <p>1 TUSD's Instagram page, correct? 2 A. Correct. 3 Q. Okay. Actually, well, sorry, the 4 second icon is a link to the X page, correct? 5 A. Correct. 6 Q. The fourth icon, is that Vimeo? 7 A. I believe so. 8 Q. The fifth icon, is that a link to 9 TUSD's YouTube page? 10 A. Correct. 11 Q. The sixth icon, is that a link to 12 TUSD's LinkedIn page? 13 A. Yes. 14 Q. And what is the last icon? 15 A. That is the Awareity platform. As I 16 had mentioned before, Awareity is our platform 17 for students and anyone, really, to report any 18 concerns. 19 MS. DEGTAREVA: Okay. Let's mark 20 as Exhibit 16 tab 19. 21 (Tucson-30(b)(6)-Shivanonda-16 was 22 marked for identification.) 23 BY MS. DEGTAREVA: 24 Q. Ms. Shivanonda, this is a printout 25 from TUSD's Facebook page.</p>

<p style="text-align: right;">Page 182</p> <p>1 Do you see that?</p> <p>2 A. I do.</p> <p>3 Q. How long has TUSD had a Facebook</p> <p>4 page?</p> <p>5 A. I am not sure of how long; however,</p> <p>6 I do know that over the last several years it</p> <p>7 has been used with more consistency. I know</p> <p>8 that that's been, I guess, used with more</p> <p>9 consistency just over the last couple of years.</p> <p>10 Q. When you say "with more</p> <p>11 consistency," do you mean more often?</p> <p>12 MR. CUTLER: Object to form.</p> <p>13 THE WITNESS: Yes.</p> <p>14 BY MS. DEGTYAREVA:</p> <p>15 Q. And on TUSD's Facebook page, is</p> <p>16 there anything warning students or families</p> <p>17 about TUSD's position that Facebook could be</p> <p>18 harmful to mental health?</p> <p>19 A. I have not done a deep dive of the</p> <p>20 TUSD Facebook page, so at face value on this</p> <p>21 document, I am not seeing anything.</p> <p>22 Q. And according to -- at least at the</p> <p>23 time this page was printed, it says that TUSD</p> <p>24 has 24,000 followers on Facebook, correct?</p> <p>25 A. That's what it looks like.</p>	<p style="text-align: right;">Page 184</p> <p>1 this?</p> <p>2 A. I do.</p> <p>3 Q. Are you aware of any warning that</p> <p>4 TUSD has posted on its Instagram page that</p> <p>5 Instagram could be harmful to students?</p> <p>6 A. I have, again, not done a deep dive</p> <p>7 of the TUSD Instagram page; however, I'm not</p> <p>8 seeing anything on this document.</p> <p>9 Q. And at the time that this printout</p> <p>10 was made, it said that TUSD had 3,335 followers</p> <p>11 on Instagram, right?</p> <p>12 A. That is correct.</p> <p>13 Q. TUSD posts content on its Instagram</p> <p>14 page, right?</p> <p>15 A. Yes.</p> <p>16 Q. TUSD posts pictures of its students</p> <p>17 on the Instagram page, right?</p> <p>18 A. Again, those that have submitted for</p> <p>19 media postings, yes.</p> <p>20 Q. TUSD allows people to like content</p> <p>21 on its Instagram page, right?</p> <p>22 A. Yes, appears so.</p> <p>23 Q. And people can leave comments on</p> <p>24 TUSD's content on the Instagram page, right?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 183</p> <p>1 Q. Now, individual schools within TUSD</p> <p>2 also have Facebook -- or at least some of the</p> <p>3 schools have Facebook pages, right?</p> <p>4 A. Yes. I don't know if all do, but</p> <p>5 many do, yes.</p> <p>6 Q. And TUSD at times posts photographs</p> <p>7 of its students on its Facebook page, right?</p> <p>8 A. Only students that have -- the</p> <p>9 parents have signed waivers for digital media to</p> <p>10 be used.</p> <p>11 Q. It allows people to like content on</p> <p>12 its Facebook page, right?</p> <p>13 A. It appears so, yes.</p> <p>14 Q. And TUSD allows people to post</p> <p>15 comments on its Facebook page, right?</p> <p>16 A. I would say for the majority of them</p> <p>17 probably. There might be some where that may be</p> <p>18 restricted, but...</p> <p>19 MS. DEGTYAREVA: Let's mark as</p> <p>20 Exhibit 17 tab 21.</p> <p>21 (Tucson-30(b)(6)-Shivanonda-17 was</p> <p>22 marked for identification.)</p> <p>23 BY MS. DEGTYAREVA:</p> <p>24 Q. Ms. Shivanonda, this is a printout</p> <p>25 from TUSD's Instagram page. Do you recognize</p>	<p style="text-align: right;">Page 185</p> <p>1 MS. DEGTYAREVA: Okay. Let's mark</p> <p>2 as Exhibit 18 tab 22.</p> <p>3 (Tucson-30(b)(6)-Shivanonda-18 was</p> <p>4 marked for identification.)</p> <p>5 BY MS. DEGTYAREVA:</p> <p>6 Q. Ms. Shivanonda, this is a printout</p> <p>7 from TUSD's YouTube account.</p> <p>8 Do you recognize this?</p> <p>9 A. I do.</p> <p>10 Q. How long has TUSD had a YouTube</p> <p>11 account?</p> <p>12 A. The district has used YouTube for</p> <p>13 varying degrees for several years. Most of the</p> <p>14 TUSD media, at least at the beginning of the use</p> <p>15 of YouTube, was not public, it was used</p> <p>16 internally. We still also have many of our</p> <p>17 videos that are internal use, and then very</p> <p>18 specific of what may be public.</p> <p>19 Q. There is some content that is public</p> <p>20 on TUSD's YouTube page?</p> <p>21 A. There is some content that is</p> <p>22 public, yes.</p> <p>23 Q. Are you aware of any content that</p> <p>24 TUSD has posted onto its YouTube page that warns</p> <p>25 students that YouTube could be harmful?</p>

47 (Pages 182 - 185)

<p style="text-align: right;">Page 186</p> <p>1 A. Directly on its YouTube page, I am 2 not aware. 3 Q. And at the time that this printout 4 was made, it says that TUSD has 2.46 thousand 5 subscribers on its YouTube page, correct? 6 A. That's what this says, yes. 7 MS. DEGTAREVA: Now let's take a 8 look at Exhibit 19. We'll mark tab 40 as 9 Exhibit 19. 10 (Tucson-30(b)(6)-Shivanonda-19 was 11 marked for identification.) 12 BY MS. DEGTAREVA: 13 Q. So if you turn to the page after the 14 document -- or after the page that says Produced 15 in Native Format, do you see that this is a 16 presentation from Valencia Middle School, 17 Welcome Vesey Elementary Parents? 18 A. Vesey, yes. 19 Q. Vesey. 20 Are those both schools in TUSD? 21 A. They are. 22 Q. And if you turn to the last page of 23 this presentation, do you see where it says, 24 "Parent notification: website, Instagram, 25 Facebook, and Twitter of daily happenings"?</p>	<p style="text-align: right;">Page 188</p> <p>1 Q. Is this an event that Tucson Unified 2 School District put on? 3 A. This is an event that, yes, the 4 Vesey school counseling department puts on 5 annually. 6 Q. And so this is a flyer that's 7 inviting students to register for this college 8 night, correct? 9 A. Correct. 10 Q. Now, do you see that there is a -- 11 well, first, a barcode next to "Prior to Tucson 12 College night" -- 13 A. Yes. 14 Q. -- on the right of the page? 15 A. Mm-hmm. 16 Q. So students are able to use their 17 cellphones to -- not barcode, QR code -- to scan 18 the QR code? 19 (Room interruption.) 20 (Discussion off the record.) 21 BY MS. DEGTAREVA: 22 Q. So going back to the exhibit we were 23 on, students are able to use their cellphones to 24 scan this QR code in order to register for this 25 college fair, correct?</p>
<p style="text-align: right;">Page 187</p> <p>1 A. Oh, okay. Yes. 2 Q. So TUSD schools encourage parents to 3 use these websites to learn about daily 4 happenings at the schools, is that right? 5 MR. CUTLER: Object to form. 6 THE WITNESS: The school district 7 tries to keep up with the times. And we 8 know that the majority of our students and 9 our parents, they utilize social media 10 more so than maybe e-mail, so in order to 11 be able to provide regular information, it 12 does leverage the platforms that the 13 community is using, yes. 14 MS. DEGTAREVA: Let's mark as 15 Exhibit 20 tab 23. 16 (Tucson-30(b)(6)-Shivanonda-20 was 17 marked for identification.) 18 BY MS. DEGTAREVA: 19 Q. Do you see at the bottom of this 20 page it says Tucson Unified School District? 21 A. I do. 22 Q. And then the document appears to be 23 titled Get Ready for Tucson College Night. 24 Do you see that? 25 A. I do.</p>	<p style="text-align: right;">Page 189</p> <p>1 A. Correct. 2 Q. And then there's a code at the 3 bottom for the Snapchat app, correct? 4 A. Correct. 5 Q. That was another way that students 6 were able to either find information about or 7 register for this college fair, correct? 8 A. Correct. 9 MS. DEGTAREVA: Actually, I think 10 now might be a good time to break. Let's 11 go off the record. 12 THE VIDEOGRAPHER: We are going off 13 record. The time is 6:27. 14 (Whereupon, the deposition was 15 adjourned.) 16 THE VIDEOGRAPHER: The time on the 17 record today for counsel for Snap is 2:46. 18 And we're off the record. 19 20 21 22 23 24 25</p>

<p style="text-align: right;">Page 190</p> <p>1 CERTIFICATE OF COURT REPORTER</p> <p>2</p> <p>3 I, MAUREEN O'CONNOR POLLARD,</p> <p>4 Registered Diplomate Reporter, CSR No. 14449 for</p> <p>5 the State of California, the officer before whom</p> <p>6 the foregoing deposition was taken, do hereby</p> <p>7 certify that the foregoing transcript is a true</p> <p>8 and correct record of the testimony given; that</p> <p>9 said testimony was taken by me stenographically</p> <p>10 and thereafter reduced to typewriting under my</p> <p>11 direction; and that I am neither counsel for,</p> <p>12 related to, nor employed by any of the parties</p> <p>13 to this case and have no interest, financial or</p> <p>14 otherwise, in its outcome.</p> <p>15 Dated this 9th day of April,</p> <p>16 2025.</p> <p>17</p> <p>18 <u>Maureen O. Pollard</u></p> <p>19 MAUREEN O'CONNOR POLLARD</p> <p>20 CSR No. 14449</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 192</p> <p>1 -----</p> <p>2 E R R A T A</p> <p>3 -----</p> <p>3 PAGE LINE CHANGE</p> <p>4 _____</p> <p>5 REASON: _____</p> <p>6 _____</p> <p>7 REASON: _____</p> <p>8 _____</p> <p>9 REASON: _____</p> <p>10 _____</p> <p>11 REASON: _____</p> <p>12 _____</p> <p>13 REASON: _____</p> <p>14 _____</p> <p>15 REASON: _____</p> <p>16 _____</p> <p>17 REASON: _____</p> <p>18 _____</p> <p>19 REASON: _____</p> <p>20 _____</p> <p>21 REASON: _____</p> <p>22 _____</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 191</p> <p>1 INSTRUCTIONS TO WITNESS</p> <p>2</p> <p>3 Please read your deposition over</p> <p>4 carefully and make any necessary corrections.</p> <p>5 You should state the reason in the appropriate</p> <p>6 space on the errata sheet for any corrections</p> <p>7 that are made.</p> <p>8 After doing so, please sign the</p> <p>9 errata sheet and date it. It will be attached</p> <p>10 to your deposition.</p> <p>11 It is imperative that you return</p> <p>12 the original errata sheet to the deposing</p> <p>13 attorney within thirty (30) days of receipt of</p> <p>14 the deposition transcript by you. If you fail</p> <p>15 to do so, the deposition transcript may be</p> <p>16 deemed to be accurate and may be used in court.</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 193</p> <p>1</p> <p>2 ACKNOWLEDGMENT OF DEPONENT</p> <p>3</p> <p>4 I, _____, do</p> <p>5 Hereby certify that I have read the foregoing</p> <p>6 pages, and that the same is a correct</p> <p>7 transcription of the answers given by me to the</p> <p>8 questions therein propounded, except for the</p> <p>9 corrections or changes in form or substance, if</p> <p>10 any, noted in the attached Errata Sheet.</p> <p>11</p> <p>12 _____</p> <p>13 WITNESS NAME DATE</p> <p>14</p> <p>15</p> <p>16 Subscribed and sworn</p> <p>17 To before me this</p> <p>18 _____ day of _____, 20____.</p> <p>19 My commission expires: _____</p> <p>20</p> <p>21 _____</p> <p>22 Notary Public</p> <p>23</p> <p>24</p> <p>25</p>

<div data-bbox="763 201 852 228" data-label="Page-Header"><p>Page 194</p></div> <div data-bbox="243 226 831 1037" data-label="Form"><div data-bbox="243 226 831 258" data-label="Text"><p>1 LAWYER'S NOTES</p></div><div data-bbox="243 258 831 289" data-label="Text"><p>2 PAGE LINE</p></div><div data-bbox="243 289 831 1037" data-label="Form"><div data-bbox="243 289 831 321"><p>3 _____</p></div><div data-bbox="243 321 831 352"><p>4 _____</p></div><div data-bbox="243 352 831 384"><p>5 _____</p></div><div data-bbox="243 384 831 415"><p>6 _____</p></div><div data-bbox="243 415 831 447"><p>7 _____</p></div><div data-bbox="243 447 831 478"><p>8 _____</p></div><div data-bbox="243 478 831 510"><p>9 _____</p></div><div data-bbox="243 510 831 541"><p>10 _____</p></div><div data-bbox="243 541 831 573"><p>11 _____</p></div><div data-bbox="243 573 831 604"><p>12 _____</p></div><div data-bbox="243 604 831 636"><p>13 _____</p></div><div data-bbox="243 636 831 667"><p>14 _____</p></div><div data-bbox="243 667 831 699"><p>15 _____</p></div><div data-bbox="243 699 831 730"><p>16 _____</p></div><div data-bbox="243 730 831 762"><p>17 _____</p></div><div data-bbox="243 762 831 793"><p>18 _____</p></div><div data-bbox="243 793 831 825"><p>19 _____</p></div><div data-bbox="243 825 831 856"><p>20 _____</p></div><div data-bbox="243 856 831 888"><p>21 _____</p></div><div data-bbox="243 888 831 919"><p>22 _____</p></div><div data-bbox="243 919 831 951"><p>23 _____</p></div><div data-bbox="243 951 831 982"><p>24 _____</p></div><div data-bbox="243 982 831 1014"><p>25 _____</p></div></div></div> <div data-bbox="857 186 1482 1045"></div> <div data-bbox="857 1045 1482 1902"></div>

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